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An Unfinished History of Colonial Accountability: Media Representations of the Citizenship (Western Samoa) Act 1982 and Its Repeal

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I thank God for always being the sail for my canoe and the faithful current that carried me through every storm: “When you go through deep waters, I will be with you” (Isaiah 43:2)

Dedicated to my dearest late grandmother, the pillar of our family, who taught us strength and resilience. Faaleanoano Paulo 1927-2015.

and

Dedicated to my children: Sami-Tu’iuli, Melavine-Falagā, Seugagogosina-Faaleanoano, Humble-Berean and Leaso.

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Abstract

This thesis examines the New Zealand and Samoan newspaper coverage of the Citizenship (Western Samoa) Act 1982 and the subsequent campaign for its repeal. Comparing the coverage of the (Western Samoa) Act in 1982 with Arthur Anae's repeal campaign in 2002 and The Citizenship (Western Samoa) (Restoration) Amendment Act 2024 provide insights into both the evolving media coverage about citizenship and race in New Zealand, and, at a deeper level, New Zealand's relations with Samoa. Although the Citizenship (Western Samoa) Act 1982 has been referred to in passing in some scholarly texts and political biographies, it has yet to be the subject of detailed scholarly examination.

This thesis argues that New Zealand newspapers framed the passage of the Act in 1982 as a practical and legally necessary solution brought on by the Privy Council's ruling in Lesa v Attorney-General of New Zealand. Themes discussed in articles include national sovereignty, immigration policy, and race relations with only passing reference to New Zealand's colonial history with Samoa. In contrast, the *Samoa Observer* framed the Act as racially and historically unjust and put the Act into a longer history of New Zealand policy towards Samoans, although the *Savali,* the government newspaper, was more measured in its tone.

By 2024, New Zealand media reporting on the Citizenship (Western Samoa) (Restoration) Amendment Act was much more sympathetic towards Samoa, characterising the initiative as rectifying an historical injustice. However Samoan media continued to highlight controversy surrounding descendants being excluded from gaining citizenship and the narrow scope of recognition given to Falema'i Lesa. Overall, this thesis demonstrates that newspaper coverage did more than inform the public about these citizenship debates. It argues that newspapers created competing narratives of justice, belonging, and responsibility. At a deeper level, the history of the Citizenship (Western Samoa) Act shows us decolonisation between New Zealand and Samoa is incomplete.

Introduction

The Dawn Raids have featured prominently in analyses of New Zealand's relationship with the Pacific Islands. In 2021 then Prime Minister Jacinda Ardern issued a formal apology for the harm and enduring hurt caused by these raids[1] acknowledging that "whole communities felt targeted and terrorised" and that "the raids were absolutely discriminatory."[2] This apology was carried out in a traditional ifoga,[3] which represented public recognition of the harm they caused Pacific Island communities in New Zealand. Melani Anae characterizes these raids as 'the most blatantly racist attack on Pacific peoples by the New Zealand government in New Zealand's history'.[4] One element of the apology was the promise to educate New Zealanders about the raids in schools and this was reflected in the (subsequently superseded) proposal to include references to the raids in Aotearoa New Zealand history school curriculum for Years 1 to 10.[5] Although welcomed by many, there was one notable omission from the apology. The apology made no reference to the hurt caused by the Citizenship (Western Samoa) Act 1982, which deprived Samoans of their rights to New Zealand citizenship which had been upheld in a decision by the Privy Council in July of that year, following Falema'i Lesa's successful legal challenge. Falema'i Lesa arrived in New Zealand on a temporary visa in 1975 and was arrested during the Dawn Raids in 1976. Her subsequent lawsuit disputed the assumptions about citizenship and immigration status that backed the raids.

It was not until 2024, that the Citizenship (Western Samoa) Act of 1982 was repealed. That it took so long to repeal could in no way be attributed to lack of effort by politically-conscious Samoans. There was considerable protest against the legislation both in New Zealand and Samoa when it was passed in 1982. As will be discussed, both New Zealand and Samoan newspapers devoted considerable coverage to the issue, with the *Samoa Observer* being particularly critical. In 2002, Arthur Anae, a sitting Member of Parliament (MP) for the National Party, launched a petition calling for the act to be repealed. That campaign was not successful, but in 2024 Green Party MP Teanau Tuiono introduced the Citizenship (Western Samoa) (Restoration) Amendment Act of 2024. Tuiono was successful in securing a parliamentary

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[1] The dawn raids constituted a series of indiscriminate operations conducted by the New Zealand police in the mid-1970s, targeting Pacific immigrants. In New Zealand, the 1970s witnessed a notable rise in intolerance towards Pacific migrants, particularly in the context of economic downturns exacerbated by the oil crisis of 1973.

[2] Jacinda Ardern, "Speech to Dawn Raids Apology," New Zealand Government Beehive website, August 1, 2021. https://www.beehive.govt.nz/speech/speech-dawn-raids-apology

[3] Ifoga is a traditional Samoan ceremony for apology involving self-humiliation and public expression of remorse. This act includes offering 'Ie tōga, fine mats symbolizing regret and a plea for forgiveness from the aggrieved party. It is part of traditional dispute resolution in Fa'a Sāmoa, used when mediation fails.

[4] Melani Anae, *The Platform; The Radical Legacy of the Polynesian Panthers* (Bridget Williams Books; 1st edition, 2020), p. 90.

[5] Ricky Prebble, "Polynesian Panthers and the Dawn Raids," New Zealand History, Date accessed September 03, 2024, https://nzhistory.govt.nz/te-akomanga/contexts-activities/teaching-polynesian-panthers-dawn-raids#related_content_events

majority to pass the act, but its scope was limited because it only granted New Zealand Citizenship to Samoans born between 1924 and 1949 and not their descendants.

An analysis of the ways in which the media covered the introduction and repeal of the Citizenship (Western Samoa) Act provides important insights into how Samoa, and Pacific Peoples more broadly, have been represented in New Zealand and Samoan newspapers. They also provide a window through which to examine the domestic politics of New Zealand and Samoa and the relationship between the two countries.

Research questions:

1. How did New Zealand and Samoan newspapers report/portray the Citizenship (Western Samoa) Act 1982?

2. How did New Zealand and Samoan newspapers report on Arthur Anae's petition to repeal the Citizenship (Western Samoa) Act 1982 in 2002 and the Citizenship (Western Samoa) (Restoration) Amendment Act of 2024.

3. What insights does print media coverage of these events tell us about relations between New Zealand, Samoa and the Pacific Islands more broadly?

Motivation for the Research

The Citizenship (Western Samoa) Act 1982 means much more to me than simply an Act of Parliament. I chose this topic because many Samoans lost their rights to citizenship lasting 42 years. This loss was not restricted to 1982, it had a significant impact upon families across generations.

The Citizenship (Western Samoa) Act 1982 is tied to the memory of my late grandmother (God rest her soul), who, although she was born in Samoa at the time when she should have been acknowledged as a New Zealand citizen, was not. She passed before she was ever able to live in New Zealand, which should have been her second home. She was one of many who were excluded from these rights.

Choosing to focus on the Citizenship Act and its repeal filled the void that the Citizenship (Western Samoa) Act 1982 created not only for myself but also for others. While the 2024 repeal marked an important step, it benefited only a limited group, leaving many, like my late grandmother, outside its reach. This study is therefore both an academic inquiry and a personal effort to ensure that these stories are not forgotten.

Scholarship on New Zealand and the Pacific Islands

There has been considerable scholarship on New Zealand's relations with the Pacific Islands, but the Citizenship (Western Samoa) Act 1982 in 2002 and the Citizenship (Western Samoa) (Restoration) Amendment Act of 2024 have not been examined in detail in this literature. The existing literature does, however, provide important historical context in evaluating the legislation. Its impact cannot be fully understood without reference to New Zealand's role as a determined coloniser in the Pacific Islands. Mary Boyd's summary of New Zealand's engagement with the Pacific Nations frames New Zealand's relationship as imperialist and colonial. Demonstrating New Zealand's administration of Western Samoa, Boyd argues that New Zealand went into the Pacific not merely out of duty, but with desires of its own, convinced

that it was "best fitted to rule Polynesians."[6] New Zealand's leadership felt entitled to control Pacific Islanders. But for all this certainty there was doubt. Boyd remarks that it took New Zealand "a long time to make up its mind that it was a Pacific country, not a European outpost," and its Pacific pretensions could later seem little more than "howling empire from an empty coast."[7]

Boyd also demonstrates that New Zealand's post-WWI governance of Western Samoa represented a long-term intervention into its political, economic, and social life. Colonial interventions implemented new regimes of land, labour, and governance based on racial ideologies, wherein:

> Pre-Darwinian liberals and humanitarians believed that racial differences were cultural and would gradually vanish as Christianity, commerce and civilization spread and Europeans and native peoples were peacefully amalgamated. Social Darwinists believed that differences were physical and inborn; that whites were superior to coloureds; that half-castes inherited the worst characteristics of both. These doctrines justified their faith in white dominance and colonial rule and policies of protecting native people from European settlers and from immigrant Asian labour.[8]

These ideologies supported efforts to remake Samoan society even when New Zealand was wholly incapable of effectively administering Samoa. As Boyd puts it, its "shortcomings in governing Polynesians were more obvious than its successes."[9] While Boyd does not discuss the 1982 Act, she uncovers the distinct conflict between authority and legitimacy that served as a significant foundation for New Zealand's later approach to Samoan citizenship.

Historians have also pointed out, however, that New Zealand's position in the Pacific owed just as much to longer imperial traditions. Historian Angus Ross has written that New Zealand was heavily influenced by legacies of British imperialism, such that political elites came to view New Zealand itself as a "southern Britain," entitled to spread its influence into the South Pacific.[10] Ross's work presents New Zealand's outlook as driven not just by reaction, but by long-standing ambition.

Ross's work therefore provides context to New Zealand's subsequent administration of Western Samoa as part of a longer trend towards expansion and influence. Samoa is therefore seen not as odd, but a continued influence where New Zealand began to emerge as a regional power. Ross's analysis expands on prior research, contending that New Zealand's actions in the Pacific were driven by both practical concerns and a vision of regional dominance. However similar to Boyd his work deals primarily with New Zealand's earlier imperial activity rather than later amendments like the Citizenship (Western Samoa) Act 1982.

Extending from this, historians have also discussed the implications of New Zealand's administration over Samoa. Works have highlighted some of the discord and resistance faced

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[6] Mary Boyd, "New Zealand and the Other Pacific Islands," in *The Oxford Illustrated History of New Zealand, edited by Keith Sinclair*, (Auckland: Oxford University Press, 1996), p. 296.

[7] Boyd, "New Zealand and the Other Pacific Islands," p. 295.

[8] Boyd, "New Zealand and the Other Pacific Islands," p. 300.

[9] Boyd, "New Zealand and the Other Pacific Islands," p. 298.

[10] Angus Ross, *New Zealand Aspirations in the Pacific in the Nineteenth Century*, (Oxford, Clarendon Press, 1964), p. 4.

during colonial rule in Samoa. *Mau: Samoa's Struggle for Freedom* by Michael J. Field centres not on imperial desire but on everyday life under New Zealand rule. By doing this Field emphasises how New Zealand rule was accepted and fought against by Samoans living in Samoa. Field's work highlights how Samoans were not content to be colonised and resisted New Zealand through the Mau. Field goes on to say that New Zealand's government often approached Samoa with limited knowledge of Samoan culture and social structure, which caused friction between Samoans and their governing authority. Field states there was a failure to appreciate the Samoan way of doing things: a "fundamental misunderstanding about what Samoa was."[11] This resentment was consistent throughout New Zealand's colonial rule due to the contradictory desires of Samoans and the government.

However, Field also locates these moments of tension within a broader critique of colonialism itself. His assertion that racism and paternalism served as justifications for many of New Zealand's actions seeks to show that Samoa was treated paternalistically as a place to be governed rather than a people New Zealand could govern with. Field builds upon the works of Boyd and Ross to show that New Zealand intent and institutional infrastructures had tangible effects on Samoa. Like Boyd and Ross before him, Field concludes with Samoan Independence and does not discuss subsequent developments such as the Citizenship (Western Samoa) Act 1982.

Political memoirs provide some insights into the Citizenship (Western Samoa) Act. Hugh Templeton's memoir *All Honourable Men* states that the Privy Council ruling was "a potentially explosive issue" and asserts Jim McLay discovered "a skilful way through this tangled problem."[12] David Lange recalls that the Privy Council found that “something like 100,000 Western Samoans were in fact New Zealand citizens.”[13] He describes travelling to Western Samoa with Attorney-General Jim McLay to assess local reactions and notes that both governments later agreed that “the citizenship bestowed by the Privy Council would be withdrawn.”[14] Though both memoirs provide helpful first-hand accounts from participants, neither discuss the Lesa decision, the Citizenship (Western Samoa) Act 1982 nor its portrayal in New Zealand or Samoan newspapers in any depth. Indeed, many political biographies ignore the act entirely, for example it is not discussed in Gustafson’s biography of Robert Muldoon.

Emerging scholarship has challenged approaches that isolate New Zealand from larger imperial histories. Foremost among these scholars has been Tony Ballantyne whose book *Webs of Empire* provided innovative ways of thinking about colonial New Zealand as part of larger imperial networks. Rejecting past conceptualisations of the British Empire as a hierarchical system with Britain at the core and colonies on the periphery, Ballantyne argued that empire functioned through networks of contact where ties of connection crisscrossed between colonies and connected back to Britain. Instead he says the empire was “not as a single web but as a complex array of webs,” kept going by many linked relationships.[15] He applies this idea to New Zealand, showing that colonial life was built by people, ideas, and habits moving

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[11] Michael J. Field, *Mau: Samoa’s Struggle for Freedom* (Auckland: Reed Publishing, 1984), p. 220.

[12] Hugh Templeton, *All Honourable Men: Inside the Muldoon Cabinet, 1975-1984* (Auckland: Auckland University Press, 1995), p. 188.

[13] David Lange, *My Life,* (Auckland: Viking, 2005), p.146.

[14] Lange, *My Life*, p.147.

[15] Tony Ballantyne, *Webs of Empire: Locating New Zealand’s Colonial Past* (Wellington: Bridget Williams 2012), p. 45.

through empire networks. Ballantyne argues that knowledge circulated through imperial networks and that "the circulation of knowledge that was the very lifeblood of the web."[16] Knowledge is key: settler groups weren't just copies of Britain but grew through "translation, accommodation and improvisation," where local people both took in and fought against colonial power. In this way, Ballantyne puts New Zealand into a larger empire setting, seeing how the colony "fashioned its own webs of influence in the Pacific."[17] With regard to indigenous peoples, Ballantyne argues in the *New Oxford History of New Zealand,* that political institutions "fashioned and reinforced visions of the political community."[18] Māori never fully gave up their authority, so governance was a constant back-and-forth of negotiation and conflict. By the late 1800s, New Zealand was looking to expand with growing "imperial aspirations" in the Pacific.[19] Ultimately, Ballantyne's point is that these structures weren't neutral, they were built by the empire, which helps us understand how citizenship was later defined and restricted.

Such an interpretation builds upon Boyd's, Ross's and Field's work by situating New Zealand's involvement in Samoa within an expanded imperial context. Although Ballantyne offers a provocative theoretical framework for empire, his study focuses almost exclusively on the nineteenth century. It does not consider subsequent legislative developments including Citizenship (Western Samoa) Act 1982. This leaves the utility of this expansive empire of networks to contemporary concerns with citizenship, law and belonging open to further historical investigation.

Scholarship on the Media in New Zealand

Ian F. Grant's research shows how vital newspapers were in shaping what New Zealanders knew about the world. He explains that they worked in a system where "increasingly, newspapers were printing the same national and international news," making the information people received very similar.[20] Their reach also grew because "improved roads and transport allowed the morning papers… to take the news further into remoter areas," connecting the whole country.[21] Grant also points out that they weren't truly neutral. They "claimed, but not entirely convincingly, to be politically independent," but actually "the city papers generally made little attempt to disguise their preference for conservative governments."[22] In the end, Grant shows that these papers weren't just reporting facts; they were powerful tools that influenced politics.

While newspaper owners claimed neutrality, they also controlled a product that was influenced by their own politics. Editorially newspapers generally reflected the ideologies of their owners, who were usually politically conservative. Grant also points out that the mix of voices in New Zealand's media was restricted by the way the business was organised. Because there were

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[16] Ballantyne, *Webs of Empire,* p. 45.

[17] Ballantyne, *Webs of Empire,* p. 45.

[18] Tony Ballantyne, "The State, Politics and Power, 1769-1893," in *The New Oxford History of New Zealand,* ed. Giselle Byrnes (Melbourne: Oxford University Press, 2009), p. 99.

[19] Ballantyne, "The State, Politics and Power," pp. 123-124.

[20] Ian F. Grant, *Pressing On: New Zealand's Newspapers, 1921-2000* (Wellington: Victoria University Press, 2002), p. 3.

[21] Grant, *Pressing On,* p. 11.

[22] Grant, *Pressing On,* pp. 11-12.

fewer Māori-language newspapers by the start of the 20th century, and because of financial struggles where a “lack of circulation data” blocked the “advertising support vital to survival” Māori viewpoints were pushed to the sidelines.[23] Although invaluable as an historical overview of newspapers in New Zealand, Grant's history is largely descriptive and does not consider newspaper treatment of Pacific peoples.

Patrick Day also analysed New Zealand media history. Day asserted that New Zealand broadcasting history had been characterised by an ongoing tension between public service ideals and commercial goals. Day noted that the commercialisation of broadcasting altered media institutions, stating that "political and commercial activity will come to be seen principally as a part of corporate life," and that "the task for the future surely is to resist that understanding."[24] While Day focused his historical analysis on broadcasting rather than newspapers, his work offers helpful background into how New Zealand media existed within political and commercial frameworks.

Media Coverage of Pacific Peoples in New Zealand

David Pearson’s *A Dream Deferred* offers theoretical models to explain media coverage of Pacific peoples in New Zealand. He challenges simple readings of New Zealand’s race relations history, warning against attempts to impose “a neat linear path towards the present” or reduce conflict to “a simple tale of heroes and villains.”[25] Pearson also explores how national myths influence how people understand history and relate to different groups. He observes that myths “provide explanations of past events which, in turn, facilitate our understanding of the present and guide future hopes.”[26] He further suggests that, for many Pakeha, the Treaty of Waitangi helps uphold “the mythology of ‘one people’, and of New Zealand’s ‘good race relations’.”[27] His framework reveals how narratives of national unity often mask inequalities and competing historical interpretations.

Pearson also explores how national myths influence how people understand history and relate to different groups. He observes that myths “provide explanations of past events which, in turn, facilitate our understanding of the present and guide future hopes.”[1] He further suggests that, for many Pakeha, the Treaty of Waitangi helps uphold “the mythology of ‘one people’, and of New Zealand’s ‘good race relations’.”[2] His framework reveals how narratives of national unity often mask inequalities and competing historical interpretations.

This understanding of ethnicity is helpful to unpacking media coverage of Pacific peoples as newspapers and broadcasting did not simply cover Pacific peoples in New Zealand, but were responsible for the creation and dissemination of mediated public narratives about them. Pearson’s insistence on the historically contingent creation of ethnic categories aids analysis into why Pacific peoples were so frequently cast in restrictive or racialised ways in New Zealand media discourse, especially in times of racialised political discord such as during the Dawn Raids of the 1970s and the citizenship debates of 1982. Pearson reminds readers that

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[23] Grant, *Pressing On,* p. 613.

[24] Patrick Day, *Voice and Vision: A History of Broadcasting in New Zealand* (Auckland: Auckland University Press, 2000), p. 421.

[25] David Pearson, *A Dream Deferred: The origins of ethnic conflict in New Zealand* (Auckland: Allen & Unwin, 1990), p. 213.

[26] Pearson, *A Dream Deferred*, p. 228.

[27] Pearson, *A Dream Deferred*, p. 229.

newspapers and broadcasts should not simply be consumed as neutral media coverage, but rather should be understood as another cog in a racist machine that upholds hierarchy and inequality. Fellow sociologist Steve Maharey made similar observations about the media arguing, "it is vital that people become familiar with the way in which news and current affairs make what is a highly selective and constructed view of the world look real."[28]

A number of works have argued that the news media has either reinforced, or failed to critically analyse, common and often misleading ideas about Pacific Islanders. As a consequence, it is argued, the media helped to establish a popular anti-Pacific Islander prejudice among large sections of the Pākehā population. Political figures, the police, and the Department of Immigration depicted Pacific Islanders as 'over-stayers' in the wider context of a massive migration panic associated with the over-staying issue in New Zealand during the 1970s. According to De Bres and Campbell:

> Apart from the fact that the detection of overstayers continues to involve dawn raids, detention, police dogs and life-long sanctions on re-entry, the individual overstayers are not the only ones who suffer. The continuation of dawn raids has its effect on community relations generally, particularly as Pacific Island communities are already sensitive to the racist tendencies in the New Zealand society. Pacific islanders are understandably sensitive that they, as brown-skinned New Zealand residents, have been the target for harassment by the police and immigration department.[29]

These experiences were also influenced by broader social and institutional forces, not just racist actions by individuals. Indeed, Paul Spoonley identified racism within social structures themselves, rather than just in personal views or media portrayals. He argued racism was built into the "structure, often complex and hidden," of organizations, which lead to unfair treatment of marginalised peoples.[30] When referring to the media, Spoonley says that "the purpose of providing the following material is to illustrate the effect of racial disadvantage."[31] Spoonley's analysis shows how media institutions can contribute to the reproduction of racial meanings by the ways they select and frame information to support wider processes of inequality.

Melani Anae[32] argues that media reporting assisted in circulating and amplifying the racialised fear whipped up by the Dawn Raids. She noted that "news of the Dawn Raids began to filter through in the newspapers, the radio and on television and on the 'coconut wireless.'"[33] Pacific communities felt shocked, upset and afraid when they learnt about the Dawn Raids. During and after the raids, the media reinforced notions of Pacific peoples, constructed by the state, as "illegal overstayers." These actions further racialised what it meant to be labelled an "overstayer." Anae remembers that "we had always been viewed as 'suspect,' as criminals by

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[28] Steve Maharey, "Understanding the Mass Media," in *Between the Lines, Racism and the New Zealand Media,* eds. Paul Spoonley and Walter Hirsh (Auckland: 1990), pp. 18-19.

[29] J. de Bres and R. Campbell, *The Overstayer: Illegal Migration from the Pacific to New Zealand* (Cutler and McCollam Printers Ltd, 1976), p. 23.

[30] Paul Spoonley, *Racism and Ethnic Identity* (Auckland: Oxford University Press, 1988), p. 30.

[31] Spoonley, *Racism and Ethnic Identity,* p. 31.

[32] Dr Melani Anae is a Samoan academic, former Polynesian Panther activist, and former Senior Lecturer of Pacific Studies at the University of Auckland. She is sister to former MP Arthur Anae, and has Samoan chiefly titles Lupematasila (Falelatai) and Misatauveve (Si'umu).

[33] Anae, *The Platform,* pp. 98-99.

police, as thieves by employers... and as economic liabilities by the state. And now, being suspect was state-sanctioned."[34] Such reporting helped justify the monitoring, policing, and deportation of Pacific peoples through racial stereotypes. As will be discussed later, memories of the Dawn Raids and their impacts upon Pacific communities shaped how Samoan newspapers later wrote about the Citizenship (Western Samoa) Act.

Anae also identified bias in newspaper reporting. She noted "very few newspapers were sympathetic or pointed to the hypocrisy of the government's suddenly cracking down on workers whose immigration status they had turned a blind eye to for years."[35] This silence revealed a hypocrisy at the heart of New Zealand's labour system. Pacific peoples were embraced when their labour was required, yet the contribution they made was quickly forgotten once immigration became restricted. Ultimately, however, Anae positions media representation as part of a broader political agenda. Racialised media narratives were used to win popular support for restrictive policies. By the mid-1970s immigration had become an important political issue, and Robert Muldoon was "a brilliantly intuitive politician who knew how to work the media."[36] He used it to connect pacific migration to reduced incomes and unemployment, and increasing social disorder. This message was circulated primarily on television, which is characterised by Anae as spreading "half-truths, lies and exaggerations."[37] This allowed politicians to "manipulate knowledge and to say what they liked, without fear of recrimination."[38] Images of Pacific peoples presented them as threats to jobs and houses, undercutting welfare support for neighbours, and causing widespread fear among the public. Media reports thereby legitimised crackdowns on immigration and intensified police monitoring of Pacific communities. Media representations didn't just reflect dominant opinions in New Zealand, they actively constructed them.

Damon Salesa's work provides important insights into the experiences of Pacific peoples in New Zealand. In his book *Island Time,* he first establishes that racial segregation throughout Auckland is both commonly acknowledged and largely accepted.[39] Instead of Aucklander's talking about segregation, however, he argues it is not discussed and seen as "essentially unremarkable, almost natural" something that demands "little comment and no explanation."[40] Salesa disputes this notion, stating that "this current state is not natural but the result of many of the decisions and choices New Zealanders make."[41] In the *New Oxford History of New Zealand,* Salesa discusses the historical factors shaping the experiences of Pacific peoples in New Zealand. As will be discussed in chapter one, he makes a strong case that we need to see New Zealand as an actual empire, not just a colony. He calls out historians for what he describes as a "purposeful and studied ignorance" regarding New Zealand's role in the Pacific.[42] He contends that New Zealand ran its island territories in "powerfully asymmetric ways," using a type of colonial authority that was often uneven and forced especially in Samoa.

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[34] Anae, *The Platform,* p. 99.

[35] Anae, *The Platform,* p. 100.

[36] Anae, *The Platform,* p. 103.

[37] Anae, *The Platform,* p. 104.

[38] Anae, *The Platform,* p. 104.

[39] Damon Salesa, *Island Time* (Wellington: Bridget Williams Books), 2017, p. 34.

[40] Salesa, *Island Time,* p. 34.

[41] Salesa *Island Time,* p. 35.

[42] Damon Salesa, "New Zealand's Pacific," in *New Oxford History of New Zealand,* ed. Giselle Byrnes (Melbourne: Oxford University Press, 2009), p. 149.

By looking past just "domestic colonialism," he uncovers a much larger "tropical empire" where race, power, and governance dictated life for Pacific Islanders.[43] Although Salesa makes only passing reference to the Citizenship (Western Samoa) Act 1982, his work provides important insights into how citizenship rules were part of a long-standing imperial habit of controlling belonging.

In addition to the New Zealand government's apology for the Dawn Raids, some media organisations have also recognized their own historical role in race relations. In 2020 Stuff, a news website in New Zealand that was administered by Fairfax but presently operates independently as Stuff Ltd., apologised for the paper's historically racist depictions of Māori, and made a commitment to 'right historic wrongs of institutional racism across New Zealand media.' "Across all its platforms in late 2020, Stuff said "no mātou te hē - we are sorry" for adopting a monocultural lens and for unfair portrayals of Māori in its reporting. The apology came off the back of Our Truth, Tā Mātou Pono, a months-long investigation into its own news coverage dating back to the mid-1800s."[44]

Primary Sources

Sources consulted for this study include contemporary newspaper articles drawn from both hard copy and online archives. Archives of newspapers held on microfilm at Auckland City Library were used to read copies of original editions of the *New Zealand Herald* and *Auckland Star*. Reading the newspapers as they were first published allowed for observation and analysis of nuances of layout, language and tone used by newspapers to frame stories. Online newspaper databases were used to access newspaper articles that were not available through microfilm. Papers Past is a comprehensive database of newspaper articles digitised from newspapers published in New Zealand, including Christchurch newspaper the *Press,* which was published until 1995. Auckland Council Libraries subscribe to an online newspaper resource called Newztext, provided by Knowledge Basket, which also offered valuable resources for keyword searching across multiple newspapers published since 1980.

In addition to newspapers other official sources have been drawn upon in this research to help understand media reports in a broader political/legal context. These have included government sources such as parliamentary debates Hansard and various statements and papers produced by governments available on New Zealand government websites. Official papers from the Samoa National Archives, the Nelson Public Library (Samoa) - Pacific Room collection as well as papers from the Office of the Prime Minister have been used to help provide a Samoan viewpoint to the debate and where possible a counter point to New Zealand based information.

By bringing together sources of this nature, this thesis follows an approach which allows for the analysis of not only how the Citizenship (Western Samoa) Act 1982 was presented in newspapers, but also to consider these representations within the context of other political, legal and historical events. This approach allows for a more comprehensive understanding of how media narratives were constructed, circulated, and contested across different contexts.

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[43] Salesa, "New Zealand's Pacific," p. 149.

[44] Carmen Parahi, "Carmen Parahi on Stuff's public apology to Maori:'One of the most stressful times in my life," *Stuff,* July 20, 2022. Day accessed Sep 20 2024. https://www.stuff.co.nz/pou-tiaki/300641734/carmen-parahi-on-stuffs-public-apology-to-mori-one-of-the-most-stressful-times-in-my-life

Structure of the thesis.

Chapter One traces New Zealand's involvement in the Pacific, from its Polynesian connections and nineteenth-century expansionist ambitions to the racialised migration politics of the 1970s, culminating in the 1982 Citizenship Act, which overturned the Privy Council ruling and restricted Samoan citizenship rights. Chapter Two examines how leading newspapers, the *New Zealand Herald, Auckland Star,* and the *Press* largely framed the Act as a necessary legal response to a perceived judicial "muddle," while still recording moments of Samoan protest and political dissent. Chapter Three analyzes how different Samoan newspapers characterized the Citizenship (Western Samoa) Act 1982. Chapter Four follows the long campaign to overturn the Act, from Arthur Anae's efforts in 2002 to the partial repeal in 2024, which restored citizenship to an ageing group but left their descendants excluded.

CHAPTER ONE: New Zealand in the Pacific

The Pacific Ocean constitutes a geographical area distinguished by patterns of migration and population movement. For centuries, there has been a dynamic exchange of individuals, skills, goods, and knowledge across what Epeli Hau'ofa aptly described as a "sea of islands."[45] Contrary to colonial depictions of Pacific peoples as scattered and isolated from one another, Hauʻofa said "the world of our ancestors was a large sea full of places to explore, to make their homes in, to breed generations of seafarers."[46] Colonisation did not sever these ties, though they may have been altered significantly. As Damon Salesa points out, New Zealand didn't simply control another part of the Pacific: "It gathered and ruled over dozens of overseas Pacific Islands, and tens of thousands of their people."[47] Imperial networks were created that linked people, labour and ideas across the Pacific.

This chapter offers a detailed account of New Zealand's relations with the Pacific Islands and Samoa until 1982, charting three phases of interaction that characterise this bilateral relationship. First, it discusses the pre-19th-century stage where the Pacific Islands, especially Samoa, were the source of New Zealand's indigenous culture, which developed from its Polynesian origins into distinct Māori cultures. This was the beginning of lasting genealogical and cultural links between these sites. Its second phase, which took place between the mid-nineteenth-century and 1962, included New Zealand's ambitious project of founding an empire in the Pacific Islands. This period culminated in the seizing of additional territories, including Samoa in 1914. The third phase, which started with Samoa's independence in 1962, was marked by a complex combination of decolonisation and the retention of inherited colonialism. It is important to understand this wider context when assessing the way in which print media reported on the Citizenship (Western Samoa) Act of 1982, because, as will be discussed in later chapters, varying interpretations of New Zealand's historical role in the Pacific clearly informed the ways in which print media framed the legislation to their readers.

Pacific Origins

The origins of the Māori people in New Zealand have long been a topic of scholarly debate, although there is now general agreement they have an ancestral connection to East Polynesia. Māori whakapapa has been extensively explored in historical and anthropological research, notably by scholars such as Kerry Howe and Atholl Anderson, whose works delve into both the migration history and the broader cultural narratives that have shaped our understanding of Pacific origins.[48] Kerry Howe's *The Quest for Origins*[49] addresses three fundamental questions: Where did they come from? When did they arrive? And how did they get there? In examining these questions, Howe places particular emphasis on how interpretations of Pacific ancestry have often been influenced by Western concerns related to race, political power, and more

[45] Epeli Hau'ofa, "Our Sea of islands." In *We are the Ocean, Selected Works,* (Honolulu : University of Hawaii Press, 2008).

[46] Hau'ofa, "Our Sea of Islands," p. 29 .

[47] Damon Salesa, "New Zealand's Pacific," in *The New Oxford History of New Zealand,* ed. Giselle Byrnes (South Melbourne: Oxford University Press, 2009), p. 149.

[48] Refers to genealogy, lineage, descent - reciting whakapapa was, and is, an important skill and reflected the importance of genealogies in Māori society in terms of leadership, land and fishing rights, kinship and status. It is central to all Māori institutions.

[49] Kerry R. Howe, *The Quest for Origins* (Auckland: Penguin; 2003), pp. 8-9.

recently, environmental impact. This critical framework is complemented by Atholl Anderson's chapter "Te Ao Tawhito/Old World," in *Tangata Whenua* which focuses on pre-contact periods and the broader patterns of Pacific mobility.[50] Anderson's chapter, grounded in extensive archaeological research, integrates oral traditions and Māori creation stories, thereby highlighting the complex interplay between scientific evidence and Indigenous knowledge systems.[51] His attention to the long legacy of emigration, climate-change and material culture establishes a pattern of how Māori came to live and work in Aotearoa. He argues that Māori oral traditions and archaeological evidence are essentially consistent in pointing to New Zealand first being settled in the thirteenth century by peoples coming from East Polynesia.[52] There is a broad scholarly consensus around Anderson's arguments, although some express reservations over the compatibility of tribal histories and archaeology. [53]

Together, Howe and Anderson offer a comprehensive perspective that situates New Zealand's Pacific origins within a broader historiographical and cultural context, providing a subtle understanding of the multi-layered narratives surrounding these migrations. Howe's distinction between the 'orthodox' interpretation and contemporary approaches further clarifies this debate.[54] Over time, Howe argues, the once-unified cultural identity of Polynesia evolved into separate, localized identities, with Māori culture becoming uniquely intertwined with the land and environment of New Zealand. This evolution, as Howe explains, "reflects the broader patterns of cultural divergence and identity formation that occurred throughout the Pacific as various islands forged distinctive societies while maintaining underlying connections to a shared Polynesian heritage."[55] Atholl Anderson extends this narrative by focusing on the early migrations of the Lapita people, the first settlers in West Polynesia, and their subsequent movement eastward to the Cook and Society Islands. Anderson describes how these Lapita people developed a distinct Polynesian culture, leading to "the place of a 'becoming' rather than a 'coming' of the Polynesians."[56] This eventually shaped the emerging Polynesian identities that would eventually give rise to Māori society. This emphasis on the transformative nature of these migrations, rather than simply viewing them as a series of arrivals, reframes Polynesian history as a process of continuous cultural adaptation and innovation. Anderson's study of the linguistic and archaeological evidence further underscores the shared roots of Māori culture with other Polynesian communities, illustrating continuity in language structures and oral traditions while also acknowledging the distinct adaptations that occurred in response to New Zealand's unique environment. From a longer-term perspective, these historical

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[50] Atholl Anderson, Aroha Harris and Bridget Williams, "Introduction," in Atholl Anderson, Judith Binney, and Aroha Harris (eds.), *Tangata Whenua: An Illustrated History* (Wellington: Bridget Williams Books, 2014), p. 10.

[51] Atholl Anderson, "Te Ao Tawhito: The Old World," in Atholl Anderson, Judith Binney, and Aroha Harris (eds.). *Tangata Whenua: An Illustrated History*. Wellington: Bridget Williams Books, 2014, p. 16.

[52] Atholl Anderson, *Te Ao Tawhito : The Old World 3000 BC - AD 1830,* (Wellington: Bridget Williams Books, 2018), pp. 16-36, pp. 62-69. For reviews *of Tangata Whenua* see, for example, Paerau Warbrick Review of Tangata Whenua: An Illustrated History, by Atholl Anderson, Judith Binney, Aroha Harris. *Journal of Colonialism and Colonial History* 16, no. 3 (2015).

[53] Helen Leach. "Tangata Whenua: An Illustrated History" *Archaeology in Oceania* 50 (2), 2015: pp. 117-19.

[54] Howe, *The Quest for Origins,* pp. 153-154.

[55] Anderson, "Te Ao Tawhito," pp. 24-25.

[56] Anderson, "Te Ao Tawhito," p. 25.

connections arguably help explain the tendency to conflate the experiences of Māori and Pacific peoples.

New Zealand as an Imperial Power in the Pacific

Historians have long observed that New Zealand's political elites wanted to position the country as a colonial force in the Pacific. The entry on the capture of German Samoa in the Ministry of Culture and Heritage New Zealand History website observes:

> Even as a fledgling British colony, New Zealand turned its gaze towards the Pacific. From the 1840s, early New Zealand politicians such as Sir George Grey (1812-98), Sir Robert Stout (1844-1930) and Sir Julius Vogel (1835-99) actively promoted a vision of New Zealand as the centre of a great South Pacific empire.[57]

As early as 1845, Charles Buller, who held the position of a director of the New Zealand Company, proclaimed during an address to the House of Commons:

> A British Colony in New Zealand would be the natural master of this ocean, the irresistible arbiter of all its complicated relations, and important interests. Its position would command the Pacific; its numerous harbours would supply shelter, its vast forests materials, for the greatest Navy in the world. You might make it, in truth, the Britain of the southern hemisphere: there you might concentrate the trade of the Pacific; and from that new seat of your dominion you might give laws and manners to a new world, upholding subject races, and imposing your will on the strong.[58]

Various propositions and plans, most of them attempting to establish New Zealand as a Pacific colonial power, characterised the imperial ambitions of New Zealand's late-19th-century political class. Coleman Phillips's Pacific colonisation plan, for instance, was submitted to Governor Sir James Fergusson and Premier Julius Vogel in 1873. Phillips envisaged New Zealand's 'ultimate dominion' over all the Pacific islands, along with exploiting native workers to power economies. For, as Phillips put it, 'I cannot see why we should allow European powers to take up or decline at pleasure what is ours by proximity.'[59] The scheme was not pursued, but is arguably emblematic of the imperialist spirit then existing among some members of New Zealand's government. Nicholas Hoare has cautioned against assuming broad public support for a New Zealand Empire in the Pacific at this time, identifying a range of concerns from the practicalities of administering an overseas empire to fears that involvement in the Pacific might see an influx of non-white immigrants to New Zealand.[60] Salesa argues, however, that "almost

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[57] New Zealand History, "Capture of German Samoa," accessed Oct 11, https://nzhistory.govt.nz/war/capture-of-samoa/background.

[58] UK Parliament, *Parliamentary Debates,* New Zealand, 17 June 1845, column 670 (Mr. Charles Buller) https://hansard.parliament.uk/Commons/1845-06-17/debates/10106e98-1a7f-4c5a-b802-5fb725d47ae1/NewZealand (accessed 3 February 2026).

[59] Angus Ross, *New Zealand Aspirations in the Nineteenth Century* (Oxford: Clarendon Press, 1964), p. 116.

[60] Nicholas Hoare, "New Zealand's 'Critics of Empire': Domestic Opposition to New Zealand's Pacific Empire 1883-1948," MA Thesis, Victoria University of Wellington, 2014, pp. 13-35.

all politicians" (including Māori MPs) favoured Pacific imperialism and New Zealand's Pacific expansion.[61]

The Confederation and Annexation Bill of 1884 signalled New Zealand's increasingly ambitious attitude towards the Pacific. The Act was intended partly "to facilitate the Confederation with an Annexation to the colony of New Zealand of certain Islands in the Pacific" if their own "Government or constituted authority" decided to join New Zealand.[62] The bill did not produce any immediate results in the form of New Zealand annexing Pacific Islands but signalled how New Zealand's elected representatives imagined the Pacific. New Zealand's Pacific empire was never driven purely by New Zealand's imperial desire. Its Pacific plans were linked closely with Australian desire for a presence in the region: As Salesa points out "Both places looked to the Pacific and often together." New Zealand and Australia's common vision at the 1883 Australasian convention has been summed up as an Australasian version of the Monroe Doctrine: "Hands off the Pacific!"[63] In the case of Australia, their Pacific ambitions had a personal impact on Islanders who were taken to work on plantations in Australia, a practice called "Blackbirding." As Talei Wirunrat writes many Pacific Islanders who participated in the labour trade were "kidnapped, lured, forced or coerced onto the ships bound for the sugar fields."[64] Subsequently, many of these Islanders were deported when attitudes towards non-white labour changed. These deportations, Wirunrat noted, were generally supported by both New Zealand and Australian newspapers, a forerunner of the immigration and citizenship issues that arose in the 1970s and 1980s.

Businessman, politician and diplomat John Lundon's activities in Samoa during the early 1880s typify New Zealand's increasing interest in Pacific empire-building driven by private and colonial ambition. Lundon, acting as an agent for the Auckland South Sea Island Produce Company successfully convinced the Samoan Parliament to request annexation by New Zealand. While New Zealand ultimately refused the annexation request, the acting British consul's statement in 1887 that "the leaven of truth was microscopic, the smallest remark or circumstance having been so ingeniously built upon, to produce the wished-for effect, as to make the original intention or fact quite unrecognisable"[65] is instructive of the ways in which various actors relentlessly promoted New Zealand's imperial aspirations in the Pacific, and deployed opportunism to advance their agenda.

During the late 19th century, the issue of governance over Samoa engendered considerable apprehension within New Zealand. In 1889, Britain entered into an agreement to jointly share control with Germany and the United States. A decade later, in the year 1899, the partitioning of

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[61] Damon Salesa, "New Zealand's Pacific" In Giselle Byrnes, ed. *The New Oxford History of New Zealand,* (South Melbourne: Oxford University Press, 2009), p. 153.

[62] "Confederation and Annexation," *The Maitland Mercury and Hunter River General Advertiser*, July 12, 1883, p. 4, accessed Oct 20, 2024, https://trove.nla.gov.au/newspaper/article/905898#

[63] Damon Salesa, "A Pacific Destiny: New Zealand's Overseas Empire, 1840-1945," in Sean Mallon, Kolokesa Māhina-Tuai, and Damon Salesa eds. *Tangata o le Moana: New Zealand and the People of the Pacific*, (Wellington: Te Papa Press, 2012), p.103.

[64] Talei Wirunrat, "She Imported Tommy Tanna": An Evaluation of Media Representations of the Deportation of Pacific Peoples from Australia in New Zealand and British Newspapers c. 1880-1910," (MA Thesis, Massey University, 2023), p. 6.

[65] David Routledge. 'Lundon, John,' Dictionary of New Zealand Biography, Te Ara - the Encyclopedia of New Zealand, (first published in 1993), https://teara.govt.nz/en/biographies/2l21/lundon-john (accessed 20 October 20 2024).

Samoa occurred. Germany acquired Eastern Samoa which was renamed as Western Samoa whereas the United States maintained control over the smaller islands of Manu'a and Tutuila, as well as a deep-water port located in Pago Pago, also renamed as American Samoa. Britain negotiated a trade-off involving Samoa in exchange for concessions in various territories, including Tonga, the Solomon Islands, Niue, and regions in Africa, notably Zanzibar. These arrangements were met with substantial opposition in New Zealand, as they were perceived as surrendering to foreign interests.

Richard Seddon, Premier of New Zealand between 1893 and 1906, was an ardent advocate of New Zealand as an imperial power in the Pacific. At various times he advocated for New Zealand control of Western Samoa, Fiji, and potentially Tonga, the New Hebrides, and Hawai'i.[66] These aspirations were driven by the ambition of political and economic domination, similar to the British empire, but also for New Zealand's self-proclaimed sovereignty over and dominance of Pacific nations. It is this ideological vision that provides an essential part of the picture of how New Zealand justified its sub-imperial actions and developed its relationship with the Pacific. According to Albert Wendt:

> A Pacific 'empire' seemed the pet pursuit of a few well-known New Zealand idols in the nineteenth and early twentieth centuries…What with missionaries, traders, adventurers, and the Great Powers all pursuing the colonial dream of empire. Alas, all these grandiose schemes bore no harvest. Nevertheless, the dream of Pacific annexations continued to dazzle a new crop of dreamers, and eventually found another verbose champion in Richard Seddon.[67]

New Zealand's imperial ambitions were manifested, Salesa and Brooking show, in the pursuit of Samoa, which had been at the heart of its territorial plans since 1893. Despite his vigorous lobbying, Seddon's imperialist drive brought little in the way of tangible results. As Brooking remarks, Seddon suffered from "delusions of grandeur within the Pacific region" and portrayed himself as "an energetic sub-imperialist." Within a year, even Seddon was forced to admit "that there was no prospect of speedy annexation of Samoa."[68] When the option of gaining Samoa dimmed, Seddon took action to make New Zealand an imperial nation in the Pacific with his signature "health cruise," a tour that represented New Zealand's will to shape its own imperial future.[69] Following this cruise New Zealand annexed the Cook Islands and Niue in 1901 (with Niue being separated in 1903).[70]

New Zealand's relations with the Pacific were framed by its dual role as both a colony of Great Britain and a coloniser in its own right. This two-fold dynamic characterises New Zealand's sub-imperialism. They were, in Salesa's words, "colonisers" but also, in profound ways,

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[66] Salesa, *An Indigenous Ocean,* p. 114. See also Jim Rolfe, "New Zealand and the South Pacific." (2001), https://www.wgtn.ac.nz/law/research/publications/about-nzacl/publications/special-issues/hors-serie-volume-i,-2001/Rolfe.pdf

[67] Albert Wendt, *Guardians and Wards: A Study of the Origins, Causes, and the First Two Years of the Mau in Western Samoa* (Wellington: Victoria University of Wellington, 1965), p. 32.

[68] Tom Brooking, *Richard Seddon: King of God's Own* (Auckland: Penguin Books, 2014), pp. 286-287.

[69] Salesa, "A Pacific Destiny," pp. 104-105. See also Tom Brooking, "A Noisy Sub-Imperialist: Richard Seddon and the Attempt to Establish a New Zealand Empire in the Pacific, 1894-1901," *Journal of New Zealand and Pacific Studies,* 2(2) 2014, pp. 121-137.

[70] Tom Brooking, "A Noisy Sub-Imperialist," p.103.

"colonised."[71] The very contradiction of this was central to New Zealand's relationship with its Pacific neighbours.

Historians have argued that New Zealand's imperial legacy is often neglected when discussing the history of New Zealand's relations with the Pacific. New Zealand's relationship with the Pacific had a colonial mentality that was inherited from British imperialism. This legacy fed entitlement in New Zealanders, and their drive to expand into the Pacific. Ross demonstrates how Vogel' relentlessly promoted New Zealand as the "Great Britain of the South" and advocated it assume the responsibility of "extending the British sway to the islands of the Pacific." Ross described Vogel' plan as "aggressive and naive," betraying "a singular lack of regard for the interests of the native islanders."[72]

New Zealand's existence as a British colony, the notion of a New Zealand Pacific empire was, Damon Salesa argues, interlinked with its perceived role in the British Empire:

> This notion of a significance and a future grandeur, of a Pacific destiny, would undergird all kinds of claims New Zealand would subsequently make on the region, licencing a sense shared among colonials that much of the southern part of the Pacific somehow was - or should be - a New Zealand domain...New Zealand's sense of Pacific destiny was also understood to be of special importance beyond its service to the British Empire or benefit to the nation.[73]

The eventual resistance from Native peoples, as reflected in reverse migration and resistance underlined colonialism's mobility and contestability. The 'wash of the Pacific' was always a reciprocal process, and New Zealand's efforts at sub-empire generated outcomes that reshaped the region as Seddon could never have foreseen.

New Zealand as a Colonial Power in the Pacific 1914-62

The period between 1914 and 1962 arguably represented, in historical terms, the peak of New Zealand's involvement in the Pacific as a colonial power, with New Zealand acquiring Western Samoa; securing rights to Nauru's phosphate and taking an active role in the Pacific campaign during the Second World War. New Zealand's authority was initially established as a British military administration of a technical nature. Subsequently, following the 1919 Treaty of Versailles, New Zealand assumed the role of the administrator of a Class C mandate under the auspices of the League of Nations. As Malama Meleisea noted, the beginning of World War One saw New Zealand acquire Samoa, "immediately upon the outbreak of the war in Europe, New Zealand was invited by Britain to seize German Samoa. An Expeditionary Force was sent to Samoa, and the Germans in Samoa offered no resistance. Samoa was the first enemy territory to be seized by the Allied Forces."[74] Damon Salesa argues the occupation of German Samoa was celebrated by many New Zealanders as the recovery of a territory they believed rightfully

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[71] Damon Salesa, "A Pacific Destiny: New Zealand's Overseas Empire, 1840-1945," In Sean Mallon, Kolokesa Mahina-Tuai and Damon Salesa, eds. *Tangata O Le Moana: New Zealand and the People of the Pacific* (Wellington: Te Papa Press, 2012), pp. 98-99.

[72] Angus Ross, *New Zealand Aspirations in the Pacific in the Nineteenth Century* (Oxford: Clarendon Press, 1964), pp. 113, 116.

[73] Salesa, "A Pacific Destiny," pp. 98-99.

[74] Malama Meleisea, *Lagaga: A Short History of Samoa* (Samoa Extension Centre, University of the South Pacific, 1987), p. 126.

belonged within New Zealand's Pacific empire. He notes: "far more widely celebrated was the invasion and occupation of German Samoa, undertaken by New Zealand on behalf of Britain, at the start of the war. This it did promptly and with great fanfare, recovering New Zealand's 'Alsace,' ironically, from Germany."[75]

The obtaining of Samoa was widely reported in New Zealand's newspapers. Roger Swanson observes "the Occupation of German Samoa had a lot of press coverage in New Zealand, including first-hand reporting by Malcolm Ross, free-lance journalist and photographer. He had previously covered the Samoan troubles in 1899, and so grabbed the opportunity to travel to Samoa again on the Troopship *Monowai,* with the landing party."[76] He described the landing of the New Zealand troops in the *Press* as follows:

> The object of the expedition was the capture of the German possessions in Samoa with special reference to the capital, Apia, and the wireless station, which was believed to be about three miles from town, and which had been such a valuable adjunct to the Germans in regard to their plans in the Pacific and even farther afield.[77]

As Mary Boyd points out, "the success of the operation was assured, for the Germans had decided that resistance was useless. Samoa was unfortified, the whereabouts of the German fleet was uncertain."[78] Consequently, New Zealand troops took over the administration of Samoa from Germany without any protest or violence from the German administration.

New Zealand did not change much of the German Samoan administration. From the start, New Zealand's administrators took a controlling approach. General Robert Logan, the first New Zealand Colonel to administer Samoa, was entrusted "to hold the islands and control the inhabitants."[79] He enacted various regulations that were in direct conflict with established Samoan cultural norms. Some of the changes he imposed were "bans on travelling by boat or canoe, nightly curfews from 10pm-6am, ban movement from one village to another, transfer of all German property into New Zealand hands, confiscation of all fire-arms from non-military personnel and liquor was banned for Samoans and restricted among Europeans" to name a few.[80]

In November 1918, a devastating influenza pandemic struck Samoa, resulting in the deaths of about 22% of the population. The New Zealand government's inability to manage Samoa

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[75] Salesa, "A Pacific Destiny," p. 105.

[76] Roger Swanson, "Samoa mo Samoa," May 31 2012, https://natlib.govt.nz/blog/posts/researching-samoa-samoa-mo-samoa

[77] "The Taking of Samoa: Operations in Apia," *Press,* September 10, 1914, p. 8. See also https://natlib.govt.nz/blog/posts/researching-samoa-samoa-mo-samoa The website for the Centenary History of New Zealand's involvement in World War One noted this "radio transmitter located in the hills above Apia was capable of sending long-range Morse signals to Berlin. It could also communicate with the 90 warships in Germany's naval fleet. Britain wanted this threat neutralised." "Telling the story of the 1914 occupation of German Sāmoa," New Zealand WW100, accessed Oct 14, 2024, https://ww100.govt.nz/telling-the-story-of-the-1914-occupation-of-german-sāmoa

[78] Mary Boyd, "The Military Administration of Western Samoa, 1914-1919." In *New Zealand Journal of History* 2, no. 2 (1968): p. 148.

[79] Mary Boyd, "The Record in Western Samoa to 1945." In Angus Ross (ed.) *New Zealand's Record in the Pacific Islands in the Twentieth Century,* (New York : Humanities Press, 1969), p. 115.

[80] Meleisea, *Lagaga*, pp. 127-128.

effectively worsened the crisis. Samoans attributed the high death toll to the administration's negligence and lack of preventive measures. This tragedy heightened local retaliation towards New Zealand's colonial rule and fuelled the Samoan struggle for self-determination, leading to resistance movements like the Mau in the 1920s.[81] Damon Salesa has argued the influenza epidemic was directly linked to the emergence of a Samoan independence movement:

> The 1918 influenza epidemic, in which nearly one-fifth of the population died, sparked Samoan discontent. In the 1920s the Mau a Pule, an organisation seeking Samoan autonomy and "Samoa for Samoans," was established…this movement recalled an earlier Mau, formed by Lauaki Namulauulu Mamoe in 1903-4 to oppose German government.[82]

Michael Field and Mary Boyd offer insightful observations about Samoan anticolonial resistance, including the creation of the Mau movement and events surrounding Black Saturday, 28 December 1929. This was when eight Samoans and a New Zealand policeman were killed. Boyd pins the cause of the rise of the Mau on the oppressive regime of Colonel Stephen Allen Richardson, claiming that "Richardson's tactless, dictatorial rule precipitated the Mau" and its nonviolent resistance movement toward self-rule under the British crown. He further stated that Samoans are "backward children" while half-castes are "the dregs of civilization"[83] Field explores the devastation of Richardson's regime, noting the killing of Tupua Tamasese Lealofi III, Mau chief, in the police massacre of Black Saturday. Tamasese's final words call upon his followers to seek peace "and do not dream of avenging it," emphasizing the Mau's stance on non-violence and peaceful dissent.[84] As will be discussed, memories of New Zealand colonial rule remained strong in Samoa during the controversy over the 1982 citizenship act.

The post-war obtaining of rights to Nauru's phosphate for the purposes of furthering the intensification of farming in New Zealand was another area of New Zealand colonial activity in the South Pacific. In 1920, the phosphate mines on the island were taken over by the British Phosphate Commission (BPC), which consisted of Australia, New Zealand and Britain as shareholders. This three-nation enterprise was part of a wider trend of colonial powers combining to gain control over resource-depleted territory without indigenous agreement.[85] Barrie Macdonald suggests Massey promoted New Zealand's claims to Samoa so as to be better positioned in negotiations over Nauru. [86] As Macdonald observes, "Massey… decided that he wanted Western Samoa as well as Nauru, though he did little to publicise his change of

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[81] Mau is translated as an opinion/perspective/belief/point of view.

[82] Damon Salesa, *An Indigenous Ocean* (Wellington: Bridget Williams Books Ltd, 2023), p. 204.

[83] Mary Boyd, "New Zealand And the Other Pacific Islands." In *The Oxford Illustrated History of New Zealand,* ed. Keith Sinclair (2nd Edition, Auckland : Oxford University Press, 1996), p. 301.

[84] Michael J. Field, *Mau: Samoa's Struggle against New Zealand Oppression* (Wellington [New Zealand] : Reed, 1984), p. 157.

[85] Ben Doherty, "Mining Once Made this Pacific Island Unliveable, Now Residents Fear its Return," *Guardian,* September 04, 2023, accessed Oct 14, 2024. https://www.theguardian.com/world/2023/sep/04/mining-once-made-this-pacific-island-unliveable-now-residents-fear-its-return

[86] Barrie Macdonald, *In Pursuit of the Sacred Trust; trusteeship and Independence in Nauru* (Wellington: New Zealand Institute of International Affairs, Victoria University, 1988), pp. 1-9.

heart on Samoa."[87] Grant Brooks, in an article on New Zealand as an imperial power alluded to its legacy in Nauru:

> Each state may employ various policies but imperialism is not reducible to a particular policy. The policies themselves must be seen as flowing from a worldwide system of imperialist competition. This not only explains why New Zealand governments have always acted to suppress Pacific self-determination and to secure Western control of resources, but also why they whip up fear of "Chinese influence" in the Pacific, and why they sometimes even criticise "French colonialism."[88]

Samoa's transition to independence was part of a global pattern of decolonisation following the Second World War, which had implications for New Zealand's Pacific Empire.[89] Mary Boyd states that upon changing status from League of Nations Mandate territory to United Nations Trusteeship, the New Zealand Administration received direction, on 29 October 1946, instructing Colonel F. W. Voelcker to draft a Trusteeship Agreement for presentation to both the Fautua and Legislative Council. Boyd goes on to state that from the New Zealand Government's point of view, trusteeship presented "the obvious way out of the Samoan dilemma of having to choose between self-government and good government" due to it allowing "specific provisions for orderly political advancement."[90] Prior to this Boyd states that New Zealand refused immediate independence and continued to feel that Samoans should "grow into self-government,"[91] implying it would be gradual and implemented "by co-operating with New Zealand."[92] As Malama Meleisea recorded, from "midnight on 1 January 1962 New Zealand rule was officially terminated. The Samoans began the new independent era in euphoria."[93]

New Zealand Relations with Samoa After 1962

At a diplomatic level, the aspirations for the relationship between New Zealand and Samoa were formalised in the 1962 Treaty of Friendship between New Zealand and Samoa. The Treaty comprised seven articles. The first article stated "relations between New Zealand and Western Samoa will continue to be governed by a spirit of close friendship." The second: "where appropriate the two governments will consult each other on matters of mutual interest and concern." The third article promised that each of the signatories would "ensure that citizens of the other living within its territories" would be "given equitable treatment and full legal

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[87] Barrie Macdonald, *Massey's Imperialism and the Politics of Phosphate*, Massey Memorial Lecture (Palmerston North: Massey University, 1982), p. 8.

[88] Grant Brooks, "New Zealand Imperialism in the Pacific in the 21st Century," September 24, 2024, Iso Aotearoa, accessed October 14, 2024. https://iso.org.nz/2024/09/24/new-zealand-imperialism-in-the-pacific-in-the-21st-century/

[89] Ian McGibbon, *Second World War* (Te Ara - the Encyclopedia of New Zealand; June 20, 2012), accessed Oct 14, 2024. https://teara.govt.nz/en/second-world-war

[90] Boyd, "The Record in Western Samoa Since 1945," p.190. The fautua were official Samoan advisers who represented Samoa's traditional high chiefly lines. Selwyn Digby Wilson, "New Zealand's Trusteeship Administration," in A. H. McLintock, ed. *An Encyclopaedia of New Zealand*, (1966*), Te Ara-The Encyclopedia of New Zealand*, accessed Oct 29, 2026, https://teara.govt.nz/en/1966/samoa-western

[91] Boyd, "The Record in Western Samoa Since 1945," p. 187.

[92] Boyd, "The Record in Western Samoa Since 1945," p. 187.

[93] Malama Meleisea, *The Making of Modern Samoa* (Suva: Fiji Times, 1995), p. 211.

protection and access to the courts." Article Four stated "the two governments shall continue to work together to promote the welfare of the people of Western Samoa." Article Five stated that, if requested to do so by the government of Western Samoa, New Zealand would act for Western Samoa in international affairs and provide diplomatic assistance. Articles six outlined procedures for terminating the agreement and article seven indicated the date it would come into force.[94] Much would subsequently be made of this Treaty. This is reflected in the words of the then Prime Minister Keith Holyoake that "signing the Treaty is a fitting climax to the longstanding connection between our two countries."[95] During the debates over the Citizenship (Western Samoa) Act, the treaty would be cited as an example of a "special relationship" between New Zealand and Samoa, the implication being that Samoan protests against the legislation were unjustified.

Following the Second World War, an increasing number of Pacific peoples immigrated to New Zealand. Melani Anae has noted:

> Although Samoans travelled to New Zealand from the early 1900s, it was not until the 1950s that they migrated in large numbers. As New Zealand's industries and service sector expanded over the next 30 years, the search for labour was extended to territories and former territories in the Pacific. Many Samoans moved to New Zealand for greater opportunities and a better education for their children.[96]

New Zealand's post-war prosperity created a massive demand for low-skilled workers, especially in the factories located in cities such as Auckland and Wellington. Māori and Pacific Islanders functioned as a labour backstop, filling this gap in New Zealand's expanding industrial economy. This labour-sourcing system was similar to practices of labour exploitation elsewhere in colonial societies, in which Indigenous and migrant workers were brought on board to do low-paid, strenuous labour. Richard Bedford has argued:

> Like New Zealand Maori, Pacific Islanders formed a convenient and cheap labour reserve for industrial expansion in post-war New Zealand, and the demand for unskilled labour to work in the manufacturing industries in Auckland and Wellington (New Zealand's two main cities) was increasingly met at this time by Island Polynesian sources.[97]

Many Samoans considered New Zealand to be part of their own country, depending on its infrastructure for education, medicine and trade. Kallen suggested "continuing ties between

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[94] Government of New Zealand, "Treaty of Friendship between the Government of New Zealand and the Government of Western Samoa," https://www.mfat.govt.nz/assets/Countries-and-Regions/Pacific/Samoa/NZ-Samoa-Treaty-of-Friendship.pdf

[95] Statement delivered by the Right Honourable Keith Holyoake, Prime Minister, in the House of Representatives. Treaty of Friendship with Samoa (2 August 1962). *New Zealand Parliamentary Debates,* Vol. 331, 26 July to 7 September 1962, p. 1185.

[96] Melani Anae, "Samoans," (Te Ara - the Encyclopedia of New Zealand, February 08, 2005) Accessed October 15, 2024. https://teara.govt.nz/en/samoans/print#:~:text=Although%20Samoans%20travelled%20to%20New,former%20territories%20in%20the%20Pacific.

[97] Richard Bedford, "The Polynesian Connection: Migration and Social Change in New Zealand and the South Pacific." In R. Bedford (ed.), *Essays on Urbanisation in South East Asia and the Pacific* (Christchurch: University of Canterbury, 1984), pp. 115-118.

the two nations favoured the choice of New Zealand as the primary country of destination for Samoan emigrants."[98]

During this era, Pacific Island Churches became an important part of community leadership and identity. In terms of New Zealand being multicultural, Damon Salesa claims that Pacific peoples had built a "Pacific archipelago within New Zealand" that has both established Pacific environments and transformed wider New Zealand society.[99] According to Salesa, Pacific inhabitants have actively designed and transformed New Zealand's social structure, creating space for themselves, while also influencing traditions and institutions. He points to Pacific churches as good models, noting that these churches, of which Auckland alone has hundreds, are important community networks, Pacific-centred and Pacific-led.[100] This supports the argument that the presence and contributions of Pacific communities not only made New Zealand society better, but have built into it a unique and lasting Pacific identity, one that equates cultural preservation with larger changes in society.

The welcome initially extended to Pacific peoples in New Zealand, however, changed during the 1970s when the economy stagnated. Damon Salesa has written:

> Pacific Islanders had been attracted to New Zealand as part of a strategy to address labour-market shortages in process work and manufacturing. These low-skill, low wage jobs were plentiful in the 1960s and early 1970s, but as the New Zealand economy slowed, and key policies changed, the days of plentiful work ended and the welcome mat appeared less predictably.[101]

The 1973 oil crisis and economic recession resulted in increased unemployment and created hatred towards newly arrived Pacific Islanders. New Zealanders influenced by appealing narratives came to see these migrants as competition for an increasingly stressed labour market. Pacific Islanders were also blamed for a perceived decline in inner-city neighbourhoods and rising law and order problems. James Mitchell has located the tensions surrounding Pacific Island immigration within a wider context of uncertainty over national identity in New Zealand.[102] As Paul Spoonley has noted: "During the Labour government of 1972-75, police and immigration officers were attempting to find and deport those who overstayed their permits. Raids on the alleged overstayers' houses, usually early in the morning, so that they might be arrested before they had woken up which began in 1974."[103] State-sponsored raids on Pacific Islander communities were the first in a long history of racialized surveillance that deepened social barriers during a strained economic period. They continued

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[98] Evelyn Kallen, *The Western Samoan Kinship Bridge: A Study in Migration, Social Change and the New Ethnicity* (Leiden: E.J. Brill, 1982), p. 53.

[99] Damon Salesa, *Island Time: New Zealand's Pacific Futures* (Wellington: Bridget Williams Books, 2017), pp. 13-14.

[100] Salesa, *Island Time*, pp. 13-14.

[101] Salesa, *Island Time*, p. 12.

[102] James Mitchell, "Immigration and National Identity in 1970s New Zealand", (PhD Diss., University of Otago, 2023), p. 4. https://www.abuseincare.org.nz/assets/Evidence-library/Part-2/Mitchell-J-Immigration-and-national-identity-in-1970s-New-Zealand-Doctoral-Thesis-University-of-Otago-2003.pdf

[103] Paul Spoonley, "Ethnic and religious intolerance - Intolerance towards Pacific migrants," Te Ara - the Encyclopedia of New Zealand, http://www.TeAra.govt.nz/en/ethnic-and-religious-intolerance/page-4 (accessed 29 October 2024).

with a heightened intensity in 1975 and 1976 under the National Party government led by Robert Muldoon. These raids often landed Pacific Islanders on charges of visa avoidance without trial. According to Paul F. Green, these actions reveal an unfortunate trend of "reducing some groups to lesser or inferior races'' and discriminating against Pacific and Maori (tangata whenua) populations much more severely than towards any other migrant community.[104] Melani Anae describes the Dawn Raids as they came to be known, as "the most blatantly racist attack on Pacific peoples by the New Zealand government."[105] David Pearson recognised the underlying power imbalance in his book *A Dream Deferred* on race relations in New Zealand, in which he argued that ethnic relations were "conditioned by asymmetrical power relations, which often put minority groups at a disadvantage."[106]

The racist character of New Zealand's immigration laws and the persecution of Pacific Islanders was not limited to those who found themselves in the depth of it. Those measures, De Bres recalled, 'dawn raids, detention, police dogs, and lifelong re-entry bans,' were not just punitive for "overstayers," but had "real consequences for community relations in general." This continued to reinforce Pacific Island peoples' prior hyper-sensitivity to "racist attitudes in New Zealand society," including their "collusion with police and immigration" over being "brown-skinned."[107] This double impact, both on individuals and on society in general reveals the structural discrimination built in immigration enforcement, forming the social life of a whole group through apparently racist policies. As will be discussed, the Dawn Raids remained vividly in the memories of Samoans at the time the Citizenship (Western Samoa) Bill and Apia Protocol were being publicly debated.

The growing tension over race relations also reflected an emerging demographic transition in New Zealand. At the time of the 1981 Census, New Zealand had a population of 3,140,208. Europeans numbered at 2,693,952, approximately 86 per cent of the total population while Māori made up 278,745 people (around 9 per cent). Pacific peoples were recorded as making up 88,794 of New Zealand's population, approximately 2.8 per cent of the population. Of this Pacific population, Samoans were the largest group, numbering 42,072 individuals. This figure constituted nearly half of all Pacific Islanders in New Zealand at the time, and roughly 1.3 per cent of New Zealand's total population. Over half of all Samoans in New Zealand resided in Auckland (26,052), with Wellington being home to the second-largest Samoan population (9,066). As a result of this high concentration of Samoans in Auckland, many newspapers reporting on issues surrounding Samoan migration and citizenship prior to the Citizenship (Western Samoa) Act were Auckland-based.[108] Twenty years earlier, in the 1961 Census, the Polynesian population numbered 14,340 (0.6% of the population); Māori approximately 202,

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[104] Paul F. Green, *Studies in New Zealand Social Problems,* (Palmerston North, N.Z.: Dunmore Press, 1994, 2nd Ed,), p. 174.

[105] Melani Anae, *The Platform: The Radical Legacy of the Polynesian Panthers* (Wellington: Bridget Williams Books Ltd, 2020), p. 90.

[106] David Pearson, *A Dream Deferred: The Origins of Ethnic Conflict in New Zealand* (Wellington: Allen & Unwin, 1990), p. 19. Jacqueline Leckie has made similar observations about the experiences of Indians in New Zealand in her book *Invisible: New Zealand's History of Excluding Kiwi Indians* (Auckland: Massey University Press, 2021).

[107] J. de Bres and R. Campbell, *The Overstayer: Illegal Migration from the Pacific to New Zealand* (Cutler and Mc Collam Printers Ltd, 1976), p. 23.

[108] Government of New Zealand, "Birthplaces and Ethnic Origin," New Zealand Census 1981, vol. 7, Wellington: Department of Statistics, 1983, pp. 76-83.

070 (8%) and Europeans 2,181,902 (90%). New Zealand's Pacific Island population had nearly trebled in two decades.[109]

New Zealand Politics In the Lead Up to the Citizenship (Western Samoa) Act

New Zealand's relations with Western Samoa were very much shaped by the actions of Robert Muldoon, Prime Minister and Minister of Finance between 1975 and 1984. The Citizenship (Western Samoa) Act was passed during a period when New Zealand's relations with many African, Asian and Pacific nations were strained. New Zealand's sporting contacts with South Africa were a particularly controversial issue. The controversial decision by the New Zealand Rugby Football Union (NZRFU) to conduct a tour of South Africa in 1976 resulted in a mass boycott of the 1976 Olympic Games by African and Asian nations. Following the tour, New Zealand was a signatory to the Gleneagles Agreement in 1977, under which signatories promised to 'discourage' sporting contact with South Africa. Muldoon, however, took a markedly different interpretation of "discourage" than most signatories, arguing it did not mean withholding visas from touring teams. [110] He also believed "the Rugby Union is not going to bring a Springbok team over... The next team that comes will be when South African rugby is totally integrated at all levels."[111] By the mid-1970s, however, the focus of the anti-apartheid movement had changed from opposing South Africa's tradition of excluding non-white players to opposing any sporting contact with South Africa whilst it maintained its system of apartheid.

The decision of the NZRFU to invite the South African rugby team to visit New Zealand in 1981 and the decision of Robert Muldoon's government not to withhold visas resulted in mass protests. The Ministry for Culture and Heritage suggests these were "the largest civil disturbance seen since the 1951 waterfront dispute," with "more than 150,000 people (taking) part in over 200 demonstrations in 28 centres, and 1500 (charged) with offences stemming from these protests."[112] Trevor Richards, founding President of Halt All Racist Tours (HART) argued that rugby could not be separated from apartheid. He said that the 1981 Springbok Tour drove many New Zealanders to examine, perhaps for the first time, or certainly in more depth than before, South Africa's apartheid policies.[113]

New Zealand's sporting contacts with South Africa also caused tension with fellow Commonwealth members. The government of Australia was concerned the 1981 Springbok Tour could lead to a boycott of the 1982 Commonwealth Games in Brisbane. This worsened the already tense relationship between Australian Prime Minister Malcolm Fraser and Robert Muldoon. As Muldoon's biographer Barry Gustafson noted, "There has always been considerable trans-Tasman rivalry if not antipathy at all levels," and in the case of Muldoon and

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[109] Government of New Zealand, "Race," New Zealand Census 1961, Wellington: Government Printer, 1964, p. 3.

[110] Malcolm Templeton, *Human Rights and Sporting Contacts: New Zealand Attitudes to Race Relations in South Africa* (Auckland: Auckland University Press, 1998), p. 107.

[111] "Transcript of Press Conference," 14 July 1977, NY3/7/3/1, Part 13, Archives New Zealand, Wellington.

[112] Ministry for Culture and Heritage (Manatū Taonga), "1981 Springbok Tour / Impact of the Tour," New Zealand History, updated January 13 2022, https://nzhistory.govt.nz/culture/1981-springbok-tour/impact-of-the-tour

[113] Trevor Richards, *Dancing on Our Bone : New Zealand, South Africa, Rugby and Racism* (Wellington: Bridget Williams Books, 1999), p. 3-5.

Fraser "the antagonism ... was particularly deep and long-lasting."[114] Moreover, the New Zealand government closed its High Commission in New Delhi, India in 1982 primarily on financial grounds, although others attribute the decision to Muldoon's annoyance at then Indian Prime Minister Indira Gandhi's criticism of New Zealand's sporting contacts with South Africa. India chose to retain its mission in Wellington, although its High Commissioner Mr A. K. Budhiraja admitted he was "completely nonplussed by the closure" of the New Zealand High Commission in Delhi.[115]

Regarding relations with the South Pacific, Muldoon acknowledged its importance to New Zealand, attending all meetings of the South Pacific Forum in person during his time as Prime Minister. He promoted New Zealand aid to the South Pacific. His biographer argues, however, that he very much viewed the South Pacific through the lens of promoting New Zealand's interests: "There is no doubt that Muldoon consciously set out to take the initiative and to become more influential in the South Pacific Forum than Fraser ... and to make New Zealand more liked and respected than Australia in the region."[116]

The friction evident in New Zealand's foreign relations coincided with significant domestic tensions. Whereas New Zealand had long prided itself on having the 'best race relations' in the world, Māori protest became more prominent from the mid-1970s, most notably in the 501 day occupation of Bastion Point between 1977 and 1978. Industrial relations were another area of conflict, with many prolonged strikes significantly disrupting major construction projects and workforce productivity. The New Zealand economy was consistently affected by high costs and high inflation, to the extent that Muldoon imposed a wage and price freeze in June 1982 in an unsuccessful attempt to ease living costs. The last term of Muldoon's government between 1981 and 1984 has been characterised by historians as chaotic. As Michael Belgrave observes of this period, "His tools for dealing with such problems no longer worked, if they ever had. There was nothing in reserve."[117] Barry Gustafson similarly notes that "Muldoon's 1983 Budget was an extremely difficult one to put together. His options were severely limited." He also argues elsewhere that inflation, worsening terms of trade and the international recession increasingly limited Muldoon's capacity to deliver the economic security and social stability that was important to the post-war generation. Toward his final years in office, Prime Minister, Muldoon found himself arguing not only with bankers, financiers ... also with many of the Government's official advisers, the media, the Labour Opposition, and even some of his own colleagues.[118] Additionally, he points out there were growing signs "Muldoon was losing touch with the political mood of the country."[119] As will be discussed, this wider context was evident in the way New Zealand and Samoa print media reported on the Citizenship (Western Samoa) Act.

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[114] Barry Gustafson, *His Way: A Biography of Robert Muldoon* (Auckland: Auckland University Press, 2001), p. 219.

[115] "India will keep N.Z. post open," *Press,* February 19, 1982, p. 3.

[116] Gustafson, *His Way,* p. 222.

[117] Michael Belgrave, *Becoming Aotearoa: A New History of New Zealand* (Auckland: Massey University Press, 2024), p. 458.

[118] Barry Gustafson, *His Way,* p. 351.

[119] Barry Gustafson, *His Way,* p. 361.

Overview of Politics in Samoa 1962-1982

Samoa has its own system of governance called the faamatai[120] and adopted "what is widely regarded as a model transition."[121] Melani Anae emphasises the importance of the fa'amatai, a traditional form of governance that relies on the power of matai (family chiefs) as the engine of Samoan social-political structure. "It is the chiefly system of Samoa, and is central to the organisation of Samoan society." This is the foundation of both traditional and contemporary structures in Samoa that provides a clear example of Samoan cultural values of shared happiness, family and collective accountability. She argues that the fa'amatai is not an ancient artefact but an emerging system that continues to shape government and social life in American Samoa, and the sovereign state of Samoa. Referring to it as the "central to the organisation of Samoan society" and a "key socio-political system."[122] Anae draws attention to its function both as a government institution that maintains Samoan values while sustaining modern transitions. As Michael Field argued in the *Press*: "Three political systems exist in the world today, according to an Apia newspaper. They are the democratic, communist and matai systems."[123] Through a presentation of Samoa's matai system as one of three world systems, Field made it clear that the Samoan organisation of politics was unique, and distinct from the then dominant world ideologies of democracy and communism. This positioning means that the matai system is not just a local or regional form of governance, but a political system of global significance.

Attaining Independence had a special significance for Samoa. As famous journalist Michael Field has described it: "It was in the year of 1962 that Samoa regained that which its people felt they should never have lost, independence."[124] Field argued independence represented not only a political victory but a regaining of the pride and sovereignty lost to colonialism:

> Samoa's first prime minister was the dignified and elegant Mataafa Faumuina Fiame Mulinu'u II, the son of the one-time leader of the Fetu and the Mau. In a compromise virtually identical to that of Steinburger's system of government in the 19th century, two men were jointly Head of State at independence: Tupua Tamasese Meaole, brother of the assassinated Mau leader and one of Nelson's son-in-laws, and Malietoa Tanumafili II, son of the man who had served as fautua during the Mau period.[125]

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[120] The fa'amatai system is Samoa's ancient form of governance, through which matai lead families, manage communal land, and represent their families in village councils called fono.

[121] Cluny Macpherson and Lavasa Macpherson, "Where Theory Meets Practice: The Limits of the Good Governance program," in Elise Huffer and Asofou So'o, eds. *Governance in Samoa: Pulega I Samoa)*, (Canberra : Asia Pacific Press at the Australian National University and Institute of Pacific Studies, University of the South Pacific, c2000), p. 19.

[122] Melani Anae, Falaniko Tominiko, Ieti Lima and Vavao Fetui, "Transnational Samoan Chiefs: Views of the faamatai (Chiefly system)" *Journal of Samoan Studies,* Vol 7, No.1,(2017), p. 38. https://journalofsamoanstudies.ws/wp-content/uploads/2017/03/Vol7_no.1_3-Transnational-Samoan-Chiefs-Views-of-the-Faamatai-Chiefly-System.pdf

[123] Michael Field, "Western Samoa's Unusual Electorate System," *Press*, January 25,1979, p. 16.

[124] Michael Field, *Mau: Samoa's Struggle Against New Zealand Oppression* (Wellington (New Zealand): Reed, 1984), p. 222.

[125] Field, *Mau,* pp. 222-223.

Field emphasises the profoundly symbolic and historical character of Samoa's political leadership leading towards independence in 1962. Citing figures like "Mata'afa Faumuina Fiame Mulinu'u II, Tupua Tamasese Mea'ole and Malietoa Tanumafili II," he emphasises the continuity between Samoa's colonial resistance and its independence. Overall, Field stresses the way Samoa established independence by integrating indigenous values of collective governance with processes from the colonial past. This captures the calmness that Samoa initially experienced between the modern state and its cultural and political history, illustrating how flexible its political structures were at the crucial moment of transition.

Samoa's first few years of independence were politically stable but economic issues soon came to the forefront. Malama and Penelope Schofield Meleisea argue, "the first seven years were characterised by political continuity under the unchallenged prime ministership of Fiame Mataafa Faumuina Mulinuu II."[126] But this political security wasn't translated into long-term growth. "By 1965," Malama and Penelope Schofield Meleisea suggest, "it became apparent that the vision of continuous gradual economic growth, which would produce increasing national prosperity, had faded for some people."[127]

Growing dissatisfaction among the electorate resulted in political turmoil in the 1970s and early 1980s. The preservation of fa'a Samoa[128] emerged as a pivotal aspect during the formulation of the 1960 Constitution and the subsequent plebiscite in 1961 that endorsed independence in 1962 under this constitution.[129] The Constitution integrated the fundamental Westminster principles concerning the relationship between the Parliament and the Government.[130] Party politics did not exist until a group of politicians under the leadership of Vaʻai Kolone, in the late 1970s, set up the Human Rights Protection Party (HRPP) against Tupuola Efi's administration. Competition for power and disagreements among parliamentarians were behind the move. Vaʻai Kolone won the 1982 election and the HRPP was elected to office for the first time in 1982. Kolone's government lost power after a court case following the 1982 election, and Tupuola Efi was re-elected as Prime Minister. This only lasted for a short while after political tensions and Tofilau Eti Alesana was re-elected as HRPP leader and PM. The HRPP has not lost an election since then until the recent chaotic 2021 elections won by the FAST Party.[131] Unlike neighbours, aside from the political storm of 1982, democracy in Samoa has been politically unbroken

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[126] Malama Meleisea and Penelope Schoeffel Meleisea, *"The Independent State of Western Samoa 1962-1987,"* In *Lagaga: A Short History of Western Samoa*, ed. Malama Meleisea (Suva, Fiji : Institute of Pacific Studies), (University of the South Pacific, Apia, Western Samoa: Samoa Extension Centre of the University of the South Pacific 1987), p. 159.

[127] Meleisea and Schoeffel, "The Independent State of Western Samoa 1962-1987," p.160.

[128] Faʻa-Sāmoa is commonly known as "the Samoan way," but can also refer to a whole system of custom and values, "a distinctive lifestyle" grounded in spiritual and cultural principles.

[129] For a background discussion on Samoan independence see: James W. Davidson *Samoa mo Samoa* (Melbourne: Oxford University Press, 1967).

[130] The Constitution of the Independent State of Western Samoa 1960. https://www.ag.gov.ws/wp-content/uploads/2024/02/Constitutional-Convention-Ordinance-1960.pdf

[131] A Political party in Samoa, FAST stands for Faʻatuatua i le Atua Samoa ua Tasi, which in English is "Samoa United in Faith." FAST was founded on July 30th 2020 by Samoan MP Laʻauli Leuatea Schmidt after splitting from the long-dominant Human Rights Protection Party (HRPP). In the 2025 general election, the party maintained a majority and continued in government, with Laʻauli Schmidt as the current Samoa Prime Minister.

under the HRPP's watch. This underlying political stability is one of the qualities that have pushed the nation forward from independence.

The economic crisis of the late 1970s and early 1980s was triggered by poor government decision-making and was the first serious set-back experienced by the newly independent country. Foreign reserves were drained, exports dropped and the government was heavily in debt. This pattern of economic decline, along with dissatisfaction at low wages and salaries for public servants, led to a strike by the Public Service Association (PSA) in 1981 for an increase in salaries. The strike lasted for three months and remains the longest union strike in Samoa. During the strike, toll calls, telexes and other telecommunications services were suspended, and the strike represented Samoa's unstable connection to the rest of the world. As the *Press* reported, the closure of these crucial communication lines "close (Western Samoa) to the world, shutting the nation off physically but also symbolically from the world."[132] Rejection of Union demands was a main factor behind the change of government in 1982, when the Human Rights Protection Party assumed power. As will be discussed, these political tensions in Samoa would be cited by the New Zealand Government and some print media as justification for cancelling the 1982 Privy Council ruling.

Overview of the Citizenship (Western Samoa) Act and Apia Protocol

The Citizenship (Western Samoa) Act of 1982 and the Apia Protocol represented a response by the governments of New Zealand and Samoa to a long-term campaign by Samoans for recognition of their citizenship status. The Act arose from the Lesa versus Attorney-General of New Zealand (1982) decision, in which the Privy Council concluded that Samoans born between 1924 and 1948, when New Zealand held administrative control over Western Samoa, were citizens of New Zealand based on the British Nationality and Status of Aliens Act was passed in 1923, Part I.[133] Falema'i Lesa's defence was primarily grounded in section 7(1) of the British Nationality and Status of Aliens (in New Zealand) Act of 1928.[134] The Privy Council emphasized the clarity of this section, stating: "In Their Lordships' view, there is no escaping that s7(1) of the Act of 1928 means what it so emphatically and unequivocally says; a person born or resident in Western Samoa is to be treated in the same manner in all respects for all the purposes of the Act of 1928."[135] This unequivocal interpretation underscored the legal bind New Zealand found itself in, revealing the enduring impact of its colonial obligations and the need for new legislation to redefine the scope of citizenship.

The New Zealand Government was taken by surprise by the decision of the Privy Council and acted swiftly to negate the decision. There was particular concern at the prospect of many thousands of Samoans migrating to New Zealand, although whether this would in fact have occurred is contested. Rupert Glover argued in the *New Zealand Law Journal* that "no convincing evidence was produced to suggest that those Samoans still in Western Samoa

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[132] "Samoa hit by Strike" *Press,* April 8,1981, p. 1.
https://paperspast.natlib.govt.nz/newspapers/CHP19810408.2.10?items_per_page=10&query=PSA+Strike+Samoa&snippet=true&sort_by=byDA#researcher-tools-tab

[133] British Nationality And Status Of Aliens (In New Zealand) Bill 1923 (41-3) (SOP 1923-1), https://nzlii.org/cgi-bin/viewdb/nz/legis/hist_lcsop/bnasoanzb192341319231584/

[134] British Nationality and New Zealand Citizenship Act 1948, No. 15 (NZ), https://www.legislation.govt.nz/act/public/1948/15/en/latest/#

[135] Copy of the complete judgement of the Privy Council in, 'Lesa v Attorney General', *New Zealand Law Journal,* August (1982), p. 278.

would have used their newly-discovered New Zealand citizenship in a manner imminently detrimental to the social or economic well-being of either country," implying that the government's swift intervention had nothing to do with imminent danger but rather political incentives to establish control over immigration policy.[136]

Following the Privy Council decision, Muldoon indicated New Zealand was not prepared to accept the ruling. He arranged a meeting with Vaʻai Kolone which occurred on 1 August 1982. Following this meeting what became known as the Apia Protocol was signed. Under this arrangement all Samoans then living in New Zealand were to be granted New Zealand citizenship while those who applied after the protocol was signed would be granted permanent residence.[137]

After a short window of select committee discussion, the Citizenship (Western Samoa) Act passed its third reading on September 15, 1982. It had two principal measures. First, it effectively conferred New Zealand citizenship upon all Samoans living in New Zealand. Second, it made Western Samoans then living outside of New Zealand, who met the criteria under which Falema'i Lesa had been granted citizenship, ineligible for New Zealand Citizenship.[138] The exclusion of Samoans living outside of New Zealand from the act caused much protest in Samoa. Rupert Glover, writing in the *New Zealand Law Journal* in 1982, opined "some have suggested that an experienced and somewhat autocratic New Zealand Government imposed its own solution on an inexperienced and constitutionally imperilled Samoan Government" and presciently argued "the New Zealand Parliament did not take enough care to ensure that this country's actions would not leave a legacy of bitterness and a sense of injustice."[139] The ways in which this played out in the media will be investigated in subsequent chapters.

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[136] Rupert Glover, ''The Western Samoa Bill Background and Unanswered Questions,'' *New Zealand Law Journal,* (1982), p. 357. Patrick McCabe places Falemaʻi Lesa's case within the wider history of New Zealand appeals heard by the Judicial Committee of the Privy Council. He examines the decision in relation to New Zealand's eventual withdrawal from the Privy Council. Patrick McCabe "Patriating Appeals: New Zealand's withdrawal from the Judicial Committee of the Privy Council," MA Thesis, Massey University, 2018, pp. 66-67.

[137] William Tagupa, "Law, Status and Citizenship: Conflict and Continuity in New Zealand and Western Samoa (1922-1982)" *Journal of Pacific History,* (1994) 30-31. For the text of the Apia Protocol see https://www.mfat.govt.nz/assets/Countries-and-Regions/Pacific/Samoa/NZ-Samoa-Treaty-of-Friendship.pdf

[138] Glover, "The Western Samoa Bill,", p. 357.

[139] Glover, "The Western Samoa Bill,", p. 357.

CHAPTER TWO: Coverage of the Citizenship (Western Samoa) Act 1982 in New Zealand Newspapers

The Citizenship (Western Samoa) Act 1982 placed a spotlight on New Zealand's relations with the Pacific and race relations in New Zealand more broadly. This chapter discusses coverage of the Citizenship (Western Samoa) Act 1982 in New Zealand newspapers. It argues that the *Auckland Star, New Zealand Herald* and *Press* were generally supportive of the act in terms of editorial stance. Despite the editorial support, however, newspaper coverage gave some acknowledgement of public concern on the issue and in some instances provided spaces for critiques of New Zealand's attitudes on race. The chapter begins with an analysis of support for the legislation in newspapers. It then evaluates criticism of the legislation.

Newspapers were arguably the medium through which most people received detailed discussion of Citizenship (Western Samoa). Ian Grant referred to the period between 1921 and 2000 as the "golden period" of the New Zealand newspaper industry.[140] During this time, newspapers were a central forum of public communication, complemented by the arrival of radio from the 1930s and television from the 1960s. During this time, the larger towns in the country had their own papers and the metropolitan dailies, the *New Zealand Herald, the Auckland Star and The Press,* exercised a large measure of control over the information circulating in the country. Although radio and television were important means of communication, in an era before on-demand replays were readily available, consumers needed to be watching at the time of broadcast to receive the information they provided whereas newspaper articles were accessible both at the time of the event and were often circulated among a number of readers after publication. Advertising revenue enabled newspapers to mass produce their product and reporters were wooed by politicians from both major parties in the hope of favourable reporting. Newspapers had a prominent position in New Zealand society for much of the twentieth century. Ian F. Grant explains, newspapers had "a largely captive market and, as a consequence, much influence."[141]

The *New Zealand Herald* had a long conservative dominance of Auckland, with a circulation "of over 200,000 copies a day" by the early 1970s.[142] The *Auckland Star,* which had a more liberal editorial stance than the *New Zealand Herald,* began a long decline from the 1970s with the introduction of private radio and a second television channel.[143] Nevertheless, with a readership of 120,000 it remained an important publication during the passage of the Citizenship (Western Samoa) Act hence its inclusion in this thesis. In Canterbury the *Press*, supported by a series of strong editorial leaders, and was the province's "journal of record."[144] In 1987 it was sold to Independent Newspapers Ltd and became the first New Zealand daily to develop a news website. Later, it created a foundation for the media conglomerate *Stuff*.[145] In addition to its focus on Christchurch, the *Press* included extensive coverage of New Zealand news, much of it sourced from New Zealand Press Association articles. Collectively, these

[140] Ian F. Grant, *Pressing On: The Story of New Zealand Newspapers 1921-2000* (Masterton: Fraser Books, 2018), p. ix.
[141] Grant, *Pressing On*, p. ix.
[142] Grant, *Pressing On,* p. 431.
[143] Grant, *Pressing On*, pp. 441-443.
[144] Grant, *Pressing On*, p. 465.
[145] Grant, *Pressing On*, pp. 465-467.

three newspapers provide a reasonable representation of the range of opinion presented to the New Zealand public on the Citizenship (Western Samoa) Act of 1982.

Support for the Legislation.

The legislation was commonly presented as a justified response to an unexpected legal quandary, variously characterized as a 'mess' and muddle', that the New Zealand government had found itself in following the privy council ruling. The *New Zealand Herald* editorial of September 19 "Ending the Samoan Muddle" framed the Citizenship (Western Samoa) Act 1982 as a pragmatic and long-overdue clarification of a legal technicality rather than a racially motivated policy with severe social repercussions.[146] Overlooking Samoa's status as a former colony of New Zealand, the editorial compared the citizenship claims of Samoans with New Zealanders' potential claims to Dutch citizenship owing to Tasman's visit in 1642:

> It can only be hoped that no similar unedifying spectacle would occur in Zealand if, for instance, it were suddenly found that through an ancient legislative oversight dating from the days of Abel Tasman, all New Zealanders had the status of Netherlands citizens. New Zealanders who sought to take advantage of the situation would surely be widely regarded with distaste. And it is scarcely to be imagined that the Netherlands would fail to restore the control and sovereignty over its own affairs which it always thought it had.[147]

The *Press* expressed similar sentiments. An editorial on September 17, entitled "Out of the Samoan Mess", asserted "The Citizenship (Western Samoa) Act passed on Tuesday clears up a legal and political mess."[148] The editorial placed the responsibility for the government progressing the legislation on the Privy Council asserting it had interpreted the 1928 and 1948 acts "in what may come to be regarded as an idiosyncratic way."[149] Their ruling, it asserted, raised significant issues of principle:

> The most obvious for New Zealand was whether it was going to be able to control the possible entry of a small or large number of Western Samoans to its own population. Was an accident of history going to decide this point?[150]

The *Auckland Star,* also framed the issue primarily in legal terms. Reflecting on the legislation, an editorial 'Samoan Aspects', presented it as a rational response that would allow the maintenance of good relations between New Zealand and Samoa:

> At any rate, a judicial decision that threatened to lead to all manner of sticky legal tangles has been countered in a way that allows traditional and time-tested

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[146] "Ending the Samoan Muddle," *New Zealand Herald*, September 10, 1982, p. 6.
The New Zealand Press Association had its origins in the United Press Association, formed in 1879 as a cooperative that allowed the country's main daily newspapers to share national and international news. Mark Derby, "Newspapers: Growth and Expansion, 1860-1900," *Te Ara-The Encyclopedia of New Zealand*, published August 11, 2014, accessed July 29, 2026, https://teara.govt.nz/en/newspapers/page-2

[147] "Ending the Samoan Muddle," *New Zealand Herald*, September 10, 1982, p. 6.

[148] "Out of the Samoan Mess," *Press*, September 17, 1982, p. 12.

[149] "Out of the Samoan Mess," *Press*, September 17, 1982, p. 12.

[150] "Out of the Samoan Mess," *Press*, September 17, 1982, p. 12.

> relationships between Samoans and New Zealanders to continue. When the dust has settled, that will be seen as a good thing.[151]

As a complement to the notion that the legislation resolved a "muddle", editorial comment also raised concerns over national sovereignty. The notion that the legislation was necessary in order that New Zealand could retain authority over its own borders and preserve the integrity of its immigration policy was frequently emphasised. Accordingly, some commentary framed the legislation as a question of immigration control, and not racial discrimination. The *Press*, for example, explicitly stated, "the only appropriate course was for New Zealand to decide itself who should be citizens of this country."[152] As such, both the *Press* and the *Auckland Star* framed the question as one of national authority, where New Zealand was rightfully able to reassert immigration controls. The emphasis on this perspective downplayed New Zealand's colonial heritage and instead presented the legislation as a matter of state responsibility.

Simultaneously, the *Press* also gave the impression that this assertion of control was both reasonable and unavoidable. It characterised the government's move as "a decision that was sensible" that had returned the relationship "to what it was understood to be before the Privy Council ruled."[153] In doing so, the paper presented the legislation not as a step backwards in New Zealand–Samoa relations but as a realistic fix for legal unrealistic occurrence that had been agreed to by all sides. By focussing on bureaucratic efficiency and diplomatic niceties, it repackaged New Zealand's largely unilateral response as a powerful gesture of partnership.

In addition to the argument that the bill would uphold New Zealand's sovereignty, some newspapers also reported claims the act would maintain the independence of Samoa. Peter Wilkinson, chair of the select committee which heard submissions on the bill, warned that if the Privy Council's ruling was allowed to stand unchallenged, Samoa's independence was in danger of being fatally undermined. Addressing the House of Representatives, he asked whether members could face "the naked truth that is in the Privy Council decision":

> Think what it would do to your cherished sovereignty and independence if than 100,000 people - three-fifths of the entire population of your country - were in future to have New Zealand citizenships? And he answered, "It would undermine, perhaps destroy Samoa's independence, and this surely is one powerful reason why the Privy Council decision cannot be allowed to stand.[154]

A number of articles suggested the Privy Council decision represented a misreading of history. The notion was evident in a front page article published shortly after the announcement of the Privy Council decision in the *Press* entitled: "Citizenship "not aim of 1928 Govt.''[155] The article, attributed to the "Parliamentary Reporter," noted, "The Privy Council's decision this week which effectively makes most Western Samoans citizens of New Zealand does not seem to reflect the thinking of the Parliamentarians who in 1928 made the law which is now in contention."[156] The article went on to note that at the time the legislation was passed, the possibility that it could be interpreted as granting New Zealand citizenship to all Samoans was

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[151] "Samoan Aspects," *Auckland Star*, September 16, 1982, p. 6.
[152] "Compromise on Citizenship," *Press*, August 20, 1982, p.12.
[153] "Compromise on Citizenship," *Press*, August 20, 1982, p.12.
[154] "MPs at Odds on Citizenship Bill," *Auckland Star*, September 10, 1982, p. 10.
[155] "Citizenship not the aim of 1928 Govt," *Press*, July 22, 1982, p. 1.
[156] "Citizenship not the aim of 1928 Govt," *Press*, July 22, 1982, p. 1.

discussed in debates, but was explicitly noted as not being the intention of the bill.[157] Similarly, the *Auckland Star,* with a view to posterity, presented the legislation as something which "future historians" would support:

> Future historians will very likely see the Citizenship (Western Samoa) Act, passed by Parliament yesterday, as a commonsense counter to a Privy council ruling which amounted to an unreal assessment of the relationship that had long existed between two independent states.[158]

Presenting the issue as a matter of sovereignty and a response to an idiosyncratic ruling by the Privy Council meant the tone of newspaper coverage largely supported the government's response to its decision. In doing so, the newspapers' coverage matched Muldoon's reaction to create the impression that firm action had to be taken to protect New Zealand's sovereignty.

In this context media coverage implicitly supported Robert Muldoon's intention to position himself as decisive leader on the issue. He was quoted as saying that the judgment was "obviously a very serious matter," and that the Government would "bring together all the material and advice we can get on it before we take any action,"[159] Although conciliatory in tone, Muldoon made it clear he was prepared to act unilaterally, stating New Zealand was "prepared to go it alone in negating the landmark Privy Council decision." Acknowledging agreement with Samoa was "very much to be desired," he conceded that going it alone "would have a long-term effect on relations between New Zealand and Samoa."[160] In this, Muldoon was positioned as demonstrating strength, preferring diplomatic negotiations but also ready to legislate independently if necessary.

Muldoon was also careful to publicly separate the government's response to the Privy Council decision from New Zealand's engagement with the Pacific more broadly. Asked at the South Pacific Forum about suggestions officials had recommended New Zealand's aid to Western Samoa be leveraged in negotiations on the citizenship issue, he told the reporter the question was "unworthy," before adding: "The Privy Council decision will have no bearing on aid." In regard to the official who had reportedly suggested connecting aid to Samoan citizenship he responded "Tell me who it was and I will sack him."[161] The bluntness of Muldoon's response was in keeping with his reputation as a strong political leader. In his analysis of the governments led by Robert Muldoon and David Lange, Jon Johannson observed "A Prime Minister and their cabinet must therefore combine purpose and power, while engaging the citizenry to raise their understanding about the choices to be faced."[162]Johansson's focus on a "purpose and power" leadership offers a lens on Muldoon's approach. Muldoon certainly exercised power firmly, often favouring executive action over public consultation. He was determined to show New Zealand was acting decisively but not bullying Samoa. His insistence that aid and the citizenship dispute were separate, allowed him to show publicly that New Zealand remained Samoa's friend, while preparing to extinguish the Privy Council's decision.

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[157] "Citizenship not aim of 1928 Govt," *Press*, July 22, 1982, p. 1.
[158] "Samoan Aspects," *Auckland Star*, September 16, 1982, p. 6.
[159] "Samoan Aspects," *Auckland Star*, (editorial), September 16, 1982, p. 6.
[160] "N.Z., Samoa Disagree on Action over Citizenship," *Press*, August 14, 1982, p.1.
[161] "Forum Marks Time on Samoa," *Press*, Aug 9, 1982, p. 4.
[162] Jon Johansson, *Two Titans* (Wellington: Dunmore, 2005), p. 237.

Media coverage acknowledged the delicate diplomatic tightrope Muldoon was walking during bilateral discussions with Va'ai Kolone in Wellington.[163] Kathleen Hancock explains that Kolone enjoyed a reputation as an honest man. In fact, Kolone was said to be "the only honest MP in the South Pacific" by many who knew him.[164] Against this history, Muldoon emphasised that New Zealand wanted to settle the citizenship problem cooperatively. Muldoon assured his visitor that "we would much rather do it in a way that is completely acceptable to the Government of Western Samoa," but he was just as unequivocal about the need for New Zealand to act: "We finally must accept the responsibility as the New Zealand Government to deal with this thing."[165] He continued, saying while the New Zealand Government would table a proposal, it would not be contingent on Samoan agreement: "If he doesn't (accept) ... that certainly will affect our thinking, and next week we will talk to the Opposition and to our own caucus to see if we can get some consensus on what we should do."[166]

Despite the New Zealand government openly stating they were prepared to act unilaterally, the notion that the legislation had come about via mutual agreement between New Zealand and Samoa was put forward in some newspapers. The *Press* editorial suggested "the happy aspect is that the action is being taken with the agreement of the Western Samoan Government", and it noted that New Zealand's legislation was being accompanied by the addition of a protocol to the Treaty of Friendship (subsequently known as the Apia Protocol).[167] In other words, the *Press* expressed support for the legislation by emphasising that Samoa had agreed to it. Although factually accurate, this argument overlooked the pressure placed on the government of Western Samoa to accept the Apia Protocol. Indeed, the fact that Western Samoa had been heavily pressured into accepting the proposed changes was raised throughout submissions on the legislation.

Indeed the Apia Protocol, in which the New Zealand and Samoan governments agreed that Samoans living in Samoa would not receive New Zealand Citizenship, was generally praised as an act of effective diplomacy. The *New Zealand Herald* understood the Protocol as a political victory and a calculated use of power, focusing on the diplomatic success of the Government in regaining authority and in preserving Pacific stability:

> The framework of the solution, a protocol to the treaty of friendship between the two countries lies in a neat avoidance of legislation aimed directly at reversing the Privy Council decision. If the agreement works as expected, it will be a satisfactory and indeed a happy outcome.[168]

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[163] Va'ai Kolone, among others, served as the Prime Minister before Samoa had formal political parties. After being sworn in as the 4th Prime Minister, he was later required to stand down because of electoral laws prohibiting bribery, allowing Tuiatua to return as Prime Minister. In 1985, Va'ai Kolone, now aligned with HRPP, joined forces with Tuiatua Tupua Tamasese Efi to form the Samoa National Democratic Party (SNDP), and Kolone served one more term as Prime Minister. https://www.nzherald.co.nz/talanoa/samoa-election-2025-a-look-back-at-prime-ministers-and-their-legacies/MURJENJN6ZCDFBOAJ3Z5EWWUJM/

[164] Kathleen Hancock, *Men of Mana* (Wellington: Steele Roberts, 2002), p. 99.

[165] "Samoan Talks to Continue," *Press*, August 13,1982, p. 1.

[166] "Samoan Talks to Continue," *Press*, August 13,1982, p. 1.

[167] "Compromise on Citizenship," *Press,* August 20, 1982, p. 12.

[168] "Friendly Deal with Samoa," *New Zealand Herald*, August 20, 1982, p. 6.

The *Press* and the *Auckland Star* were also broadly supportive of the Apia Protocol which was presented as a satisfactory resolution.[169] A *Press* editorial labelled the Protocol as "a good compromise."[170] The editorial began by asserting both New Zealand and Samoa got something out of the agreement. Accordingly, it characterised the Protocol as an example of good diplomatic practice: "some compromises leave the parties without satisfaction because they seem to detract from the true aims of one or other of the parties; some compromises satisfy the main points, but stop awkward situations developing. This compromise appears closer to the latter class."[171] In this way, the *Press* presented New Zealand's action as corrective and reasonable rather than imposing unreasonable pressure.

Despite the generally supportive editorial commentary, there was some acknowledgement of Samoan concerns about the protocol. Reporting on the select committee submissions, the *Auckland Star* noted the concern of the National Council of Churches that Samoa had been "placed in a situation where a failure to accede to the proposal to deprive large numbers of Samoans of their New Zealand citizenship would have resulted in the loss of amnesty to Samoan overstayers."[172] This comment was one of the few to point out the asymmetrical power relation at work and Samoa's limited agency in the response to New Zealand's legislative timeframe.

Another mildly critical article entitled "Samoa Treaty Signed Amid Increasing Dissent," published in the *Press* acknowledged criticism of the protocol at its signing:

> New Zealand and Western Samoa sealed their citizenship agreement yesterday amid ceremonial expressions of friendship and a Samoan undercurrent of resigned acceptance and bitter criticism.[173]

Contradicting suggestions that the Protocol had been reached by mutual agreement the article noted:

> The assertion that Samoan people's views were taken into account is one cause of dissent, and there is outrage about the way the New Zealand Government imposed a deadline on the Samoans last week, in seeking an answer to the proposals.[174]

Reflecting on the difficulties faced by the Samoan government in responding to New Zealand's actions, the *Press* quoted, Minister of Broadcasting Le Mamea Ropati as saying:

> In a way, it was a very difficult deadline. Asked why his Government had taken part in the agreement, Le Mamea said, "If we do not-go along with New Zealand, that leaves us in the situation where we would have to guess what the New Zealand Government might do."[175]

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[169] "Compromise on Citizenship," *Press,* August 20, 1982, p.12. "Samoa Bill Brings Protest Flood," *Auckland Star*, September 1, 1982, p. 32.
[170] "Compromise on Citizenship," *Press*, August 20, 1982, p. 12.
[171] "Compromise on Citizenship," *Press*, August 20, 1982, p. 12.
[172] "Samoa Bill Brings Protest Flood," *Auckland Star,* September 1, 1982, p. 32.
[173] "Samoa Treaty Signed Amid Increasing Dissent," *Press*, August 23, 1982, p. 1.
[174] "Samoa Treaty Signed Amid Increasing Dissent," *Press*, August 23, 1982, p. 1.
[175] "Samoa Treaty Signed Amid Increasing Dissent," *Press*, August 23, 1982, p. 1.

While acknowledging the perspective of Samoan political leaders, the *Press* subsequently reported that Muldoon:

> Denied that the New Zealand Government had imposed any time limit on the Western Samoan Government necessitating a rushed acceptance in Apia without an opportunity for the Western Samoan Government to consult its Opposition. [176]

One of the few newspaper articles providing substantial criticism of the Apia Protocol was a *Press* article, "Samoan Backlash on Protocol Expected."[177] This article provided one of the few extended Samoan responses to the issue to be published. It quoted Pito Faalogo, who had been an editor of the *Samoa Times* between 1970 and 1977, speaking of the "resentment that is only just beginning in Samoa," where he said the Cabinet had "taken New Zealand citizenship rights from them without even token consultation." [178]He reported that Samoa's Deputy Prime Minister had told him the government had:

> Not been given much room to move by the New Zealand Government and had believed leaders at the time were told that to salvage anything for Western Samoans, the protocol had to be signed. We might lose the citizenship that the Privy Council decision conferred on people born between 1924 and 1949, but we would gain it for all people now living in New Zealand, and for those who applied for permanent residence.[179]

In printing Faalogo's description of internal splits and forced agreement, The *Press*, perhaps unintentionally, exposed the pressure behind this supposed diplomatic victory, thus confirming the idea that the Protocol's "friendship" disguised dominance and pressure. Faalogo went on to say "It is just beginning to come home to Western Samoans now that their Government signed their rights away." "Western Samoans", he stated "wanted the right given by the Privy Council decision, of New Zealand citizenship… It would be impossible for two-thirds of the Samoan population to take up the option of coming here. They are too committed in Western Samoa to jobs, families, schools, and houses." He also refuted popular myths of chain migration as "quite wrong," since Samoans in New Zealand "have been telling their extended families in Samoa that jobs are not available… We like to extend helping hands to our relatives but we do not want to put them in a worse position than they are back home."[180]

In representing Samoans as self-reliant, rather than simply self-interested, Faalogo reversed the paternalistic stereotype that had justified the Protocol. Faalogo's comments, however, were among the few in New Zealand newspapers that gave prominence to a Samoan voice expressing the emotional and political impact of the Protocol.

Further criticism of the Apia Protocol came outside of Parliament from the Western Samoan human rights group Tagi-i-Lima,[181] which, the *Auckland Star* recorded, presented a petition,

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[176] "Bill on Samoans Likely Today," *Press*, August 24, 1982, p. 1.

[177] "Samoan Backlash on Protocol Expected," *Press,* September 4, 1982, p. 23.

[178] "Samoan Backlash on Protocol Expected," *Press,* September 4, 1982, p. 23.

[179] "Samoan Backlash on Protocol Expected," *Press,* September 4, 1982, p. 23.

[180] "Samoan Backlash on Protocol Expected," *Press,* September 4, 1982, p. 23.

[181] In 2023, former Members of Parliament Anae Lupematasila Arthur Anae, and Afioga Aupito Toeolesulusulu Tofae Sua William Sio formed the Sitiseni (citizenship) group, known as "Tagi i le Lima" (the weeping hand), successfully advocated for a law change to restore New Zealand citizenship to a

variously reported as between 17,000 and 22,000 signatures (the signatures had been collected in Samoa) to the New Zealand Parliament.[182] Its leaders insisted that the agreement had been signed "without consultation or the approval and consent of those whose rights have been affected," in a matter that affected the status of thousands of people, with no democratic participation. Lawyer Foni Retzlaff, a cousin of Prime Minister Tupuola Efi, reminded New Zealanders of the extensive colonial bonds between the two countries, noting that "there was not a family in Western Samoa that did not have links with New Zealand," and that it was "ironic" the protocol limited citizenship to those with "close and effective links."[183] Retzlaff's remarks turned the debate from legal order to moral contradiction: if New Zealand's fifty years of administration had created those ties, then refusing Samoan citizenship revealed the unequal legacy of colonial authority behind cooperation and friendship. Retzlaff further argued that the agreement was in breach of Samoa's own constitution, "which deals with human rights" and that Western Samoans were "almost unanimous" in believing that their right to citizenship could not be "forcibly taken away."[184] Presenting the petitions in the streets was just one part of the attacks on the protocol. Based in Apia, Tagi-i-Lima walked the talk by handing the Prime Minister Tupuola Efi an ultimatum: renegotiate the citizenship act or face a Supreme Court case challenging its legality.[185] Retzlaff, who instigated the challenge believed that "it is possible for him (Tupuola Efi) to make an executive decision that the protocol is not constitutional."[186] The *Press* framed the challenge as a legal process rather than an underlying question of New Zealand's responsibilities towards its former colony, turning Samoan opposition into an administrative problem instead of a question of New Zealand meeting its historical obligations.

Although newspapers reported some criticism of the Apia Protocol, the majority of the coverage was positive. The *Press* emphasized the bipartisan support for the agreement. An article "Citizenship for Overstayers" noted:

> The Prime Minister, Mr Muldoon, announced the agreement reached this week between the Western Samoan and New Zealand Governments at a post-caucus press conference yesterday, at the same time as the Prime Minister of Western Samoa, Va'ai Kolone, announced it in Apia…The Government caucus agreed yesterday to give full support' to the legislation, and the Leader of the Opposition, Mr Rowling, and the leader of the Social Credit Political League, Mr Beetham, supported the package at a special briefing last week. Mr Muldoon said. No problem was expected in passing the legislation. [187]

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group of Samoans. The movement and its protests led to the passage of the Restoring Citizenship Removed by Citizenship (Western Samoa) Act 1982 Bill.
This was the same movement first formed by Lawyer and businessman Misa Telefoni Retzlaff and Georgina Moor in Samoa in 1982 during the reversal of the Western Samoa Citizenship.

[182] The *Auckland Star* reported the petition had 17,000 signatures. The *Press* put the number at 22, 000 signatures. "Samoans Try to Cancel Protocol," *Auckland Star*, September 9 1982, p. 24. "Lawyer Plans Moves Against Protocol," *Press*, September 23, 1982, p. 24.

[183] "Samoans Try to Cancel Protocol," *Auckland Star*, September 9 1982, 24. 'Lawyer Plans Moves Against Protocol," *Press*, September 23, 1982, p. 24.

[184] "Efi Told: Decide by October 4," *Auckland Star*, September 24, 1982, p. 3.

[185] 'Lawyer Plans Moves Against Protocol," *Press*, September 23, 1982, p. 24.

[186] 'Lawyer Plans Moves Against Protocol," *Press*, September 23, 1982, p. 24.

[187] "Citizenship for Overstayers," *Press,* August 20 1982, p. 1.

The *Press* also recorded Labour Party deputy leader David Lange's presence alongside Attorney-General McLay at the signing of the Apia Protocol, reinforcing the sense of political unity around the legislation. In keeping with the pattern of New Zealand newspapers characterising the Privy Council decision as having created a legal "mess" which the government needed to resolve, the *Press* presented the Apia Protocol as a resolution to the "headache" it had created: "The signing of the protocol today, (Friday in Western Samoa) should tidy up the citizenship 'headache' which arose out of the Privy Council's ruling last month on Samoan birthright."[188] The *Press* also noted that Vaʻai Kolone had been ill both at the signing of the protocol and when he visited New Zealand.[189] Through characterising the Protocol as the administration response to a government "headache," *Press* presented the Apia Protocol as standard political management, rather than an extraordinary response to a legal decision.

At the same time, the *Auckland Star* recognised the irony that "Samoan overstayers should gain a right denied other Samoans prepared to go through the correct channels to gain New Zealand citizenship," which further implied that the legislation was developed with Samoa's best interests in mind, even if the outcome seemed unreasonable.[190] By describing the law both as a protector of Samoa's independence and as potentially mitigating unforeseen legal consequences, these commentaries portrayed the Act as a necessary intervention in Samoa's best interests, characterising New Zealand as a responsible partner, not a controlling colonial power.

The existence of the migration quota, which allowed up to 1100 Samoans to enter New Zealand each year, was also portrayed by the newspapers as further evidence that Samoans already had a special entry category into New Zealand. It was yet another way of implying that the Privy Council had interfered with established immigration practices. The *New Zealand Herald* reassured its readers in the editorial "Friendly Deal with Samoa" that the quota would provide an orderly pathway and reiterated that "Samoans coming here under those procedures will have an immediate right to citizenship, as will those already resident here."[191] The *Auckland Star* pushed this line of reasoning further in its reporting of the parliamentary debate, quoting Peter Wilkinson's claim that the Privy Council ruling would "undermine, perhaps destroy Samoa's independence" as it granted rights all at once to three-fifths of Samoa's population when New Zealand had already made provision for regulated migration under the quota.[192] In each case, these newspapers used the quota as a reminder that there was a legitimate channel already in place for Samoan immigration to New Zealand, and framed the Act as a means to reassert order, rather than as a means to deny rights.

A further element to this logic was that Samoans were already considered to be better off than other Pacific nations in regard to access to New Zealand. The *Press* editorial "Compromise on Citizenship" suggested "the special relationship that Western Samoa will enjoy with New Zealand may give rise to criticism from some other South Pacific countries, whose citizens will not have the same rights."[193] This phrasing suggested that the Act was not taking rights away from Samoans but instead levelling the playing field between Pacific peoples. By casting

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[188] "Protocol Signing Today," *Press,* August 21, 1982, p. 1.

[189] "Protocol Signing Today," *Press,* August 21, 1982, p. 1.

[190] "Samoan Aspects," *Auckland Star,* September 16, 1982, p. 6.

[191] "Friendly Deal with Samoa," *New Zealand Herald*, August 1982, p. 6.

[192] "Labour Tries to Slow Down Samoan Bill," *Auckland Star*, September 9, 1982, p. 8.

[193] "Labour Tries to Slow Down Samoan Bill," *Auckland Star*, September 9, 1982, p. 8.

Samoans as already the recipients of an exceptional deal, the *Press* presented the quota as a generous concession that did not have to be extended further through Samoans being granted New Zealand citizenship.

Samoa's then unsettled political situation was also cited as a reason in favour of the legislation. *The Press* for example, asserted that New Zealand could not depend on Apia to control the Privy Council decision's aftermath. The editorial noted that "the Prime Minister of Western Samoa, who has a slender hold on power and whose own seat is under appeal, would have had some difficulty in taking an initiative which seemed to deprive Western Samoans of something that many of them might have decided that they wanted."[194] The *New Zealand Herald* similarly argued that it was "unrealistic to expect Samoa who would probably have included many the country could ill-afford to lose" to stop their citizens leaving for New Zealand.[195] This portrayal of Samoa's internal politics placed New Zealand in the role of a responsible actor, forced to take action over the citizenship question. By casting the Samoan leadership as weak and unable to control public sentiment, newspapers framed New Zealand's decision to legislate as both practical and inevitable. In this way, the Act could be seen as a short-term strain on relations between New Zealand and Samoa but in the long-term, a stabilising force which ultimately cemented New Zealand's control over determining its citizenship legislation.

Newspaper accounts of Samoa's domestic politics also emphasised the vulnerability of Samoa's government at the very time that the issue of citizenship was being discussed. The *Auckland Star* declared that Samoa was "so broke that it cannot service the loan it used to buy a Boeing 737" and was "virtually reliant upon aid from abroad, of which New Zealand provided $4.4 million last financial year."[196] As had been the case in many newspaper reports, the same article also made a connection between Samoa's financial woes and political instability, describing how a Supreme Court ruling replaced the Prime Minister Vaʻai Kolone with Tupuola Efi. This political uncertainty, the article noted, meant that "decisive government has scarcely been possible pending the outcome of the electoral petitions," which contributed to the image of Samoa as being in a weak political position.[197]

The *New Zealand Herald* picked up on this, drawing attention to how a political crisis was deepening as the Samoan election result was being contested. Reporting on the ruling of the High Court, its article detailed how all the charges of bribery and treating had been thrown out, while all the cases of "personation" (votes that were found to have been cast in the names of dead people) were upheld. The *New Zealand Herald* concluded that the decision had stripped Kolone of his seat and all but one member of his Human Rights Party, bringing the Fono (Samoan Parliament) to an even 22-22.[198] Under these circumstances of uncertainty, the *New Zealand Herald* suggested that the question of citizenship itself could quickly become the issue that decided Samoa's political future. Reporting that Kolone's cabinet was already divided over whether to accept New Zealand's proposal, the *New Zealand Herald* noted that cabinet instability had been a contributing factor to the government's fall.[199]

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[194] "Labour Tries to Slow Down Samoan Bill," *Auckland Star*, September 9, 1982, p. 8.
[195] "Friendly Deal with Samoa," *New Zealand Herald*, August 20,1982, p. 6
[196] "Samoa Crisis," *Auckland Star,* September 20, 1982, p. 6.
[197] "Samoa Crisis," *Auckland Star,* September 20, 1982, p. 6.
[198] "New Cloud Over Samoan Politics," *New Zealand Herald*, September 20, 1982, p. 1.
[199] "New Cloud Over Samoan Politics," *New Zealand Herald*, September 20, 1982, p. 1.

The Press, meanwhile, provided an inside look at Kolone's own defence at the bribery hearings. Reporting from Apia, the paper transcribed Kolone's testimony that he "had no knowledge of illegal activities allegedly done to secure his re-election" and that he had only instructed his son to go and check the rolls for voters who were dead or abroad.[200] Counsel for the petitioner, however, challenged him on his past record, taking Kolone back to the "Matai race" of 1967 when Kolone and his chief opponent Tupuola Efi created large numbers of chiefly titles in an attempt to control electoral results.[201] Such testimony only furthered the sense that Samoan politics was carried out through personalised and disputed practices that were criticised at home and had little credibility abroad.

The *Auckland Star* similarly maintained in an editorial that the political conditions of Tupuola Efi's succession of Vaʻai Kolone as Prime Minister added to a feeling of national uncertainty:

> Against this, decisive government has scarcely been possible pending the outcome of the electoral petitions. One of these has now led to the replacement of Va'ai Kolone as Prime Minister by the widely-known Tupuola Efi. With the chance remaining of further political upheaval, there cannot be hopes of quick resolution to the Samoan uncertainties. The country can at least be confident of the continuing sympathy and support of neighbouring peoples in the South Pacific region. There is no way for a mini-state, facing pressures for constitutional and social reform against a background of economic crisis, to advance with any great confidence.[202]

Collectively, these articles created an image of Western Samoa as politically uncertain, economically vulnerable, and easily manipulated. By highlighting the political instability surrounding Kolone's overthrow and Efi's political position, the New Zealand press helped to consolidate the view that Samoa could not provide the kind of stable governance that was needed to help manage the consequences of the Privy Council ruling. Such coverage in turn also reinforced New Zealand's own perceived need to act decisively and through legislation to control the process by which citizenship would be granted.

Criticism of the Legislation

Although New Zealand print media coverage of the Citizenship (Western Samoa) Act 1982 was generally positive, some critical perspectives were published. It was generally agreed that the legislation had inflamed racial tensions in New Zealand. In particular, coverage of the select committee hearings gave some prominence to Samoan grievances. In their submissions to the select committee, several submitters said the push for the bill was not motivated by legal necessity but a fear of Samoan immigration. The *Auckland Star* quoted Bruce Hucker from the National Council of Churches rejecting the measure as prejudice: "The proposed legislation panders to racist fears that there would be a large influx of Samoans."[203] The views of Reverend Leaao Siitia of the Presbyterian Church's race relations committee were also reported: "The committee believes that the idea of an influx of Samoans to New Zealand is unfounded and can appear to be the outcome of irrational and indeed racist prejudice."[204] Paumau Papali'i, the education officer for the non-government aid organisation CORSO (Council of

[200] "Samoan P.M. Denies Bribery," *Press*, September 11, 1982, p. 6.
[201] "Samoan P.M. Denies Bribery," *Press*, September 11, 1982, p. 6.
[202] "Samoa Crisis," *Auckland Star*, September 20, 1982, p. 6.
[203] "Samoa Bill Brings Protest Flood," *Auckland Star*, September 1, 1982, p. 32.
[204] "Samoa Bill Brings Protest Flood," *Auckland Star*, September 1, 1982, p. 32.

Organisations for Relief Service Overseas), called the Bill "stupid and ill-conceived," and requested an adjournment for further submissions to be made.[205] Christopher Ruthe of the Grey Lynn Neighbourhood Law Office, argued that the measure set a precedent for the passage of discriminatory legislation against "any group of New Zealand citizens."[206] Reporting such pronouncements gave public voice to the fact that many community and church leaders saw the legislation, not as a fair attempt to correct a legal oversight, but as a discriminatory measure directed against a particular Pacific people. By reporting these criticisms, newspapers contained spaces where moral as well as legal opposition to the bill was placed in the public domain, even if their overall editorial position supported the government's action.

Submissions from government institutions added weight to these concerns. The Human Rights Commission initially said the Bill had "unfortunate racist implications." Though this declaration was watered down after political pressure, it was never withdrawn.[207] Race Relations Conciliator Hiwi Tauroa, similarly, said that Samoan complainants held the view that "whatever it was going to be, it would be discriminatory against them and therefore was, in their terms, racist."[208] By reporting these perspectives, the media showed that these concerns were not only held by affected communities but recognised within New Zealand's own official institutions.

While government ministers characterised the Bill as a simple and necessary legal correction, newspapers made clear that many New Zealanders understood its intent and effects were racially motivated. Asked about the controversy as chair of the Foreign Affairs Select Committee, Peter Wilkinson admitted that the process had uncovered fault lines in race relations. The *Press* reported how Wilkinson tried to resolve between different pressures, giving weight to the Government's desire to be "fair" while also legislating quickly.[209] These revealing comments showed how the Act had laid bare social divisions, even among those responsible for defending the legislation. A *New Zealand Herald* feature on the reaction among communities in Samoa, cited Minister Le Mamea Ropati's concern for Samoans in New Zealand: "The people in New Zealand are our main concern because they are facing the hostilities and some of the harassments brought on by the New Zealand public in general."[210]

Reporting on the Citizenship Bill also revealed underlying racial tensions in New Zealand society. The *Auckland Star* recorded Peter Wilkinson's suggestion during the select committee hearings that the whole affair was a "storm warning" of more profound social divisions. He had stated that he had been taken aback at the strength of feeling in the submissions to the select committee, because "many Samoans felt they were the object of widespread hostility" and the situation had shown that New Zealand was "far less tolerant than we liked to believe."[211] An *Auckland Star* editorial, echoed Wilkinson's comments, exhorting readers to accept Samoans in New Zealand as equal citizens:

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[205] "Submissions on Samoan Bill amid Protests," *Press*, August 31, 1982, p. 1.
[206] Submissions on Samoan Bill amid Protests," *Press*, August 31, 1982, p. 1.
[207] "Downey: Samoa Bill Could Haunt Us," *Auckland Star*, September 8,1982, p. 10.
[208] "Downey: Samoa Bill Could Haunt Us," *Auckland Star*, September 8,1982, p. 10. "Racist Term Unfortunate," *New Zealand Herald*, September 8,1982, p. 3.
[209] "Compromise on Citizenship," *Press*, August 20, 1982, p. 12.
[210] "Milk and Honey Land No More," *New Zealand Herald,* August 23, 1982, p. 1.
[211] "Bill Bares Intense Race Feeling in NZ," *Auckland Star*, September 4,1982, p. 15.

> What Mr Wilkinson saw as a storm warning about our racial attitudes should certainly be heeded. Some of us clearly need to remind ourselves that New Zealand citizens of Samoan origin are as much entitled to be in our community as citizens of other origins.[212]

By publishing these views, newspapers placed before their readers concerns the political controversy over citizenship had a dimension of racial hostility and that harassment of Samoans was a consequence of the government's handling of the case.

Others claimed that by focusing on Samoa the legislation was inequitable because it failed to consider the rights of dual citizenship immigrants from other countries enjoyed. In Parliament, critics of the bill challenged the rationale of withdrawing Samoans' citizenship rights while allowing the dual nationality of other migrant communities. Labour MP F. D. (Frank) O'Flynn argued the legislation was racist, as "almost all the people to whom the Citizenship (Western Samoa) Bill would apply were non-white." The measure would apply "to a mere handful of whites" while up to "140,000 Western Samoans" would be affected.[213] O'Flynn also stated that "the bill picked on Samoans by making them the only people to have dual citizenship taken away. There were thousands of people from Britain and Holland in New Zealand who had dual citizenship, and it is only the Samoans from whom it is being stripped."[214] His remarks drew out the racial element of the legislation in contrast to the accepted practice of allowing dual nationality to be retained by European immigrants. Jim Anderton, president of the Labour Party, stated that supporters of the bill were being compared to non-white South Africans having their rights denied. He also noted that "it was absurd to say that Samoans have no desire for New Zealand citizenship without asking them."[215] Anderton, and other critics, also noted that targeting Samoans was not a neutral act or an extension of New Zealand's general immigration policy, but a racialised act.

Some reports acknowledged the historical context of colonisation in shaping the legislation. One letter to the editor, for example, praised the "remarkable courage" of the Samoan women who had petitioned against the Act, observing that they had been raised within "a paternalistic system of government based on colonialism."[216] By arguing the law they had demonstrated New Zealand's hesitancy to face up to "the inevitability of a multiracial society," the writer warned, and this conservative outlook endangered New Zealand's moral authority and leadership in the Pacific. This shows the racial implications of the Act were parallel with a more general fear about New Zealand's identity as a Pacific nation and its openness to social change.

In addition to reporting concerns of Samoans based in New Zealand, some coverage was given to responses from Samoa. In a *New Zealand Herald* article entitled 'Milk And Honey Land No More,' Tuilaepa Sailele, a Member of Parliament in Samoa was reported as stating that following the ruling, "Samoans no longer saw New Zealand as a land of milk and honey as they

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[212] "Samoan Aspects," *Auckland Star*, September 16,1982, p. 6.

[213] "Look of Racism about Samoa Bill says MP," *New Zealand Herald*, September 10, 1982, p. 5.

[214] "Look of Racism about Samoa Bill says MP," *New Zealand Herald*, September 10, 1982, p. 5.

[215] "Local MP Leads Labour Split on Samoan Bill," *Auckland Star*, September 10, 1982, p. 1. David Lange later recalled reminding Anderton that it was not appropriate for the party president to comment publicly on decisions made by Labour's elected MPs. David Lange, *My Life* (Auckland: Viking, 2005), pp. 147-48.

[216] E. Moyles, "Samoan Women," *Auckland Star*, September 23, 1982, p. 6.

did 10 years ago. For some people, it's only a country to go away to for occasions like weddings or visiting relatives and some people want to go there for education."[217]

Although, as previously stated, newspaper coverage of the Apia Protocol was generally positive at the time of its signing, there were some articles discussing how its implementation had unintended consequences. On October 30, 1982, the *Press* published an article "Protocol 'Confusion' Led to Ban."[218] The article stated that the Government's freeze on the granting of permanent residence to Samoans resulted in "confusion over the status of the protocol," with the result that Samoans in New Zealand seeking permanent residence were "left in an administrative limbo" somewhere between being illegal immigrants and full citizens.[219] The article suggested that some officials were acting on the basis that the Protocol's clause on citizenship created an automatic right to permanent residence, while others were acting "strictly ... to the granting of citizenship only." Despite the fact that these difficulties had arisen from the actions of New Zealand officials, the article implied that the prospect of Samoa repudiating the Apia Protocol was the catalyst for the actions of immigration officials. The reporter contacted Prime Minister Tupuola Efi who promised that his Government "would not take unilateral action to repudiate the protocol." When he was told that in Wellington there was talk of the situation having been created by "the noises from Apia," Efi slammed back "What noises?"[220] By such framing, the *Press*'s coverage of the Protocol reduced what looked like a colonial rupture to a simple procedural error on the part of civil servants.

Newspaper coverage drew attention to the problematic nature of the legislation for the Labour Party. As noted, its Deputy Leader David Lange had travelled with Attorney General Jim McLay to Samoa for the signing of the protocol. Whilst In Apia, Lange had spoken positively about the agreement stating it showed that New Zealand "had not 'acted the big tyrant beast of the Pacific,'" promoting the settlement as an expression of regional goodwill rather than a new form of colonial control.[221] On the one hand, parliamentary leadership and the majority of the Labour Party caucus supported the legislation on the basis it was an immigration issue but on the other hand, there were some vocal critics of the legislation within the Labour Party. The *Auckland Star* noted the ambiguous response of the Labour Party leadership on the legislation:

> Deputy leader Mr David Lange said there was no argument that legislation was needed to override the Privy council decision giving New Zealand citizenship to about 75% of Western Samoa population. But Labour was opposed to the speed with which the Government was pushing the legislation through. The situation should have been resolved "in a solemn and deliberative way.[222]

This uncertainty led newspapers to highlight Labour's discomfort with the bill. Lange's statement about wanting a "solemn and deliberative" approach indicated Labour's understanding of the need to overturn the Privy Council ruling, but unease with the Government's haste. Newspapers noted a contrast between Lange's earlier comments in Apia and his support for legislation, suggesting the party was caught between choosing a practical solution and risking disrespect toward Samoan interests. Labour's opposition to the act on

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[217] **"**Milk And Honey Land No More," *New Zealand Herald,* August 23, 1982, p. 1.

[218] "Protocol 'Confusion' Led to Ban," *Press,* October 30, 1982, p. 3.

[219] "Protocol 'Confusion' Led to Ban," *Press,* October 30,1982, p. 3.

[220] "Protocol 'Confusion' Led to Ban," *Press,* October 30, 1982, p. 3.

[221] "Bill on Samoans Likely Today," *Press,* August 24, 1982, p. 1.

[222] "Labour Tries to Slow Down Samoan Bill," *Auckland Star*, September 9, 1982, p. 8.

process grounds was framed as campaigning by the government. Lange's comments were promptly attacked by Attorney-General Jim McLay, who accused Labour of reversing their position on the issue, stating that "when the issue was first raised, it had been quite clear in its support for the Government."[223] Considerable space was given in the article to refut poor process. The *Auckland Star* reported statements made by Peter Wilkinson, the chairman of the Foreign Affairs select committee:

> The need for urgency was shown by the fact that the number of permits given for entry to New Zealand had dropped by more than 60% in the six weeks since the Privy council decision and the ban on most travel permits. The Government had set out to ensure fairness and honour prevailed, Mr. Wilkinson said, and could fairly claim to have succeeded. "We all know that the Labour Party is going to ultimately support this bill."[224]

Wilkinson's comments reflected the Government's goal of framing Labour's uncertainty as deliberate obstruction instead of principled debate. His comments highlighted the reduction in travel permits and framed the Government's actions as issues of "fairness and honour," and portraying disagreement as messy. Newspapers largely echoed this framing, allowing the Government to dismiss criticisms as nothing more than political tactics. Coverage reinforced the perception that Labour's discomfort was less important than the fact the bill was going to pass anyway.

The *Star* recognised the tension within the Labour Party between its Pacific supporters and "the bulk of its political support, the blue-collar workers living in fear and dread of an influx of Western Samoans."[225] However, many of Labour's Samoan supporters were themselves blue-collar workers, complicating the newspaper's distinction between Pacific supporters and the party's working-class base. Exchanges of this kind demonstrated both the political divisions within Parliament and the pressures on Labour to register their disapproval of discrimination, whilst being conscious of political anxiety over Pacific migration.

Helen Clark and Jim Anderton's opposition to the bill received considerable publicity. The *Auckland Star* referred to a growing division, led by the Mt Albert MP Helen Clark: "I'll oppose the bill right through. I think it's a terrible mistake."[226] Clark was supported by a resolution of the Labour Party executive which unanimously condemned the measure as discriminatory and which had been rushed through Parliament with "indecent haste."[227] The executive said that "the sight of the Government rushing through such discriminatory legislation, with racially based fears so entrenched in this country clearly providing the motivating force, is neither a credit to New Zealand nor does it augur well for our future as an inspiring leader in the South Pacific."[228] It warned that the bill would deprive New Zealand citizens of their rights "in a discriminatory way on the grounds of race and of geography," and that "citizenship should only be surrendered by personal choice, not by Government decree."[229] Party president Jim Anderton sharpened the attack, criticising supporters of the bill who said that Samoans had no desire to

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[223] "Labour Tries to Slow Down Samoan Bill," *Auckland Star*, September 9, 1982, p. 8.
[224] "Labour Tries to Slow Down Samoan Bill," *Auckland Star*, September 9, 1982, p. 8.
[225] "Labour Tries to Slow Down Samoan Bill," *Auckland Star*, September 9, 1982, p. 8.
[226] "Local MP Leads Labour Split on Samoan Bill," *Auckland Star*, September 10, 1982, p. 1.
[227] "Local MP Leads Labour Split on Samoan Bill," *Auckland Star*, September 10, 1982, p. 1.
[228] "Local MP Leads Labour Split on Samoan Bill," *Auckland Star*, September 10, 1982, p. 1.
[229] "Local MP Leads Labour Split on Samoan Bill," *Auckland Star*, September 10, 1982, p. 1.

be citizens. This, he argued, was "like South African whites saying the blacks didn't really want South African citizenship." Anderton elaborated "we shouldn't get ourselves into the situation of determining what Western Samoans want without asking them."[230] In these words was expressed the strength of feeling that Clark and the Labour executive regarded the bill not as tidying up loose ends, but as racially motivated rights denial. In comparing the attitudes towards Samoan citizenship to apartheid-era South Africa, Anderton was seeking to appeal to the many New Zealanders who had opposed the 1981 Springbok Tour. The split exposed the minority within the party who thought it a betrayal of the party's roots in racial tolerance and equality.

The *Auckland Star* noted how debate further tested Labour's unity on the second reading of the bill. David Lange reaffirmed Labour's frustration with the Government's haste, saying that "if Labour was the Government, we would have managed things differently."[231] This placed Labour in the awkward position of both agreeing with National that the Privy Council decision could not stand, while distancing itself from the Government's response. Lange stated that Labour's position should "not be seen as an endorsement for whatever the Government chose to do."[232] The article highlighted this deceit: Labour condemned the bill's process and sympathised with those who felt it was discriminatory, yet still paved the way for the legislation's final passage. In this way, the *Auckland Star* portrayed Labour as being caught between principle and being practical, and divided between those who felt obligated to maintain unity, and those like Clark and Anderton who were openly against the bill.

In opposing the legislation, a number of Labour Party MP's noted the historical context of New Zealand's involvement with Samoa. Richard Prebble referred to the ruling as "the most important constitutional decision in New Zealand's history" and condemned the Government's attempt to brush it aside as a mere legal inconvenience.[233] Prebble presented the case in historical terms, as the outcome of New Zealand's own history of colonial governance in Samoa after the First World War. During the third reading of the bill, a number of Labour MP's expressed opposition. Wellington Central MP Fran Wilde said it was "another chapter in a very unfortunate history" of relations between the two countries. She called the haste with which the bill had been conceived and passed "obscene" and asserted the legislation meant New Zealand had forfeited its claim to leadership in the South Pacific.[234] Wilde was one of five Labour Party MP's who voted against the Bill at its third reading. The others were Helen Clark (Mount Albert), Bruce Gregory (Northern Maori) John Terris (Western Hutt) and Koro Wetere (Western Maori).[235]

Frank O'Flynn's contributions to the public dissection of the bill took a different turn. If Clark focused on discrimination and the process by which it occurred, O'Flynn placed it in the longer context of New Zealand's complicated relationship with amoa. During the final parliamentary debate, O'Flynn told the House that the bill:

> Wrote another black page of our sorry history with that country. But he said he would not vote against the bill because the Government had entered into an

[230] "Local MP Leads Labour Split on Samoan Bill," *Auckland Star*, September 10, 1982, p. 1.
[231] "MPs at Odds on Citizenship Bill," *Auckland Star*, September 10, 1982, p. 10.
[232] "MPs at Odds on Citizenship Bill," *Auckland Star*, September 10, 1982, p. 10.
[233] "Privy Council's Samoa Ruling Stuns Govt," *Press*, July 21, 1982, p.1.
[234] "Samoan Bill Rushed on to Statute Book," *Auckland Star,* September 16, 1982, p. 8.
[235] "Samoan Bill Rushed on to Statute Book," *Auckland Star,* September 16, 1982, p. 8.

> international obligation for better or for worse which had to be honoured and no one could prevent the passage of the bill.[236]

O'Flynn was perhaps the most vocal Labour MP in advancing historical and moral arguments against the legislation. But if Clark voted against the bill over principle, O'Flynn, like the rest of Labour did not. In this way, his actions illustrate the gap between the need to maintain their principles, and the need to further their own political interests.

Regardless of vocal opposition from a few of their MP's, Labour's uncertain response also resulted in criticism from Mana Motuhake, a recently formed political party led by former Labour Party minister Matiu Rata, who had left the Labour Party in 1979. A *New Zealand Herald* article reporting on a planned protest march, reported Mana Motuhake's condemnation of both major parties for betraying Samoan rights to citizenship. They criticized Labour's inaction against the passing of the bill, asserting the party had "retreated from their duty," and abandoned its historical pattern of standing up for marginalized groups.[237] Rata warned that the issue was a moral, legal and racialised one, and went far beyond questions of immigration or of political benefits. He called the bill "one of the most serious matters before Parliament for years," and a reactionary response which was not only "as a response to racial hysteria, but … a betrayal of the rule of law."[238] By publishing the article and noting the planned protest march, the *New Zealand Herald* interpreted the citizenship debate as more than a political difference. It was becoming a broader social and constitutional question, with opposition parties and community groups accusing the Government of overstepping its authority, and abusing the rights of a targeted ethnic group.

Summary

In all three newspapers, coverage of the Citizenship (Western Samoa) Act 1982 largely took the Government's side and sought to reassure readers that the legislation was fair and unavoidable. For the most part, the issue was framed across the *Press*, the *New Zealand Herald* and the *Auckland Star* not as a question of Samoan rights or colonial injustice, but as a matter of legal clarity and national responsibility. Samoan protest was acknowledged, but often marginalised as emotional, impractical or simply the result of misunderstanding. In advancing these arguments, newspapers used the language suited to their electoral districts. Of the newspapers at the more conservative end of the spectrum, the predominant tone of coverage in the *Press* typically used the reassuring language of negotiation and procedure, whilst the *Herald* generally adopted a calm, measured, authoritative summary of official explanations. The *Auckland Star*, which was slightly more liberal in its stance, nevertheless appealed to the prospect of mass migration should the original Privy Council ruling be allowed to stand. In seeking to appear moderate and sensitive, the newspapers did much to normalise the Government's response and reduce Samoan grievance to an administrative one rather than a moral or historical one.

Despite the generally positive tone of newspaper commentary, there was nevertheless some space given to critical perspectives on the bill. In particular, the reporting on submissions to the select committee and the space given to Pito Faalogo's analysis gave some coverage to Samoan perspectives on the legislation and its adverse impact on race relations. Moreover, the

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[236] "Samoan Bill Rushed on to Statute Book," *Auckland Star,* September 16, 1982, p. 8.
[237] "Samoans plan protest March," *New Zealand Herald*, September 14, 1982, p. 3.
[238] "Samoans plan protest March," *New Zealand Herald*, September 14, 1982, p. 3.

opposition expressed by a minority of Labour Party MP's and its executive branch, indicated at least some recognition of New Zealand's legacy of colonial rule in Samoa.

CHAPTER THREE: Coverage of the Citizenship (Western Samoa) 1982 Act in Samoan Newspapers

In contrast to the way New Zealand newspapers presented the Citizenship (Western Samoa) Act as an overdue solution to an accidental legal confusion, the majority of the coverage in Samoan newspapers presented the same legislation as a moral and political failure. Their reporting tended to be more critical than the New Zealand media. Whereas the New Zealand newspapers generally discussed the act with reference to legal issues and immigration policies, the *Samoa Observer* characterized the Act as the result of racial hysteria and imperialism, although the *Savali* tended to be more appeasing. The dominant tone of the coverage was critical of both the New Zealand government, for its response to the Privy Council ruling, and the Samoan government, for its perceived weakness in agreeing to the Apia Protocol. This chapter begins with an analysis of the criticism of the New Zealand government before proceeding to evaluate reporting on Samoan responses to the legislation.

The *Samoa Observer* (initially titled *Observer*) was the most prominent newspaper in Samoa at the time the Citizenship (Western Samoa) Act was being debated.[239] The *Samoa Observer* started in 1978 in very humble beginnings. It was created in a cookhouse by Gatoaitele Savea Sano Malifa and Dr. Ieti Lima and was printed with the help of Jeff Marfleet, an early supporter. From lawsuits, abuse, political intervention and even death threats, it took a strong fight by Malifa for truth and justice to keep it going. From its beginnings as a small weekly, the paper has flourished and become one of the leading daily newspapers of the Pacific. A critical watchdog on party politics, it has often functioned as the unofficial opposition to Governments, having played a key role in highlighting corruption and raising wider issues of accountability in government. Despite the challenges of running a daily newspaper in a very small and remote nation, the *Samoa Observer* has been at the heart of Samoa's democratic life. Misa Lepou notes the continuing primacy of the newspaper in both print and digital forms:

> The *Samoa Observer* is the largest newspaper in the country and the only one published seven days a week. It is published in English and Samoan and prints around 5000 copies daily. It has its own press at its new headquarters in Vaitele, Apia and has an online service which features daily news.[240]

In the period under review, the *Samoa Observer* included articles from New Zealand correspondents, particularly Michael Field, and some New Zealand Press Association reports, as well as articles and editorials by its Samoa-based reporters. Collectively, these gave readers an insight into both Samoan and New Zealand perspectives on the Citizenship (Western Samoa) Act.

The *Savali* newspaper was first published in 1906 by the German Administration of Samoa and is regarded as the oldest periodical publication still operating in the country. Today it continues to operate as a government publication, producing a weekly bilingual newspaper as well as a

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[239] The *Samoa Observer* was initially titled *The Observer* but was later renamed the *Samoa Observer*. For the sake of consistency, this newspaper will be referred to as the *Samoa Observer* in this thesis.
[240] Misa Vicky Lepou, "Samoa's Media Freedom Climate: 'Shining the Light,'" *Pacific Journalism Review,* 23, 2, (2017), p. 18.

monthly Samoan-language issue that includes information from the Land and Titles Court.[241] *Savali* has a unique role in the media environment of Samoa. It is primarily intended to inform the public about government legislation and very much reflects the viewpoint of the government of the day. Its written expression tends to be formal and neutral in tone. One factor to keep in mind in assessing the relative influence of the newspapers is the distribution and readership of Samoa's newspapers during this time. Although *Savali* was the official government voice, it likely had a smaller readership than its competitors. Locals regularly found copies of the *Samoa Observer* in almost every shop throughout the country, unlike the *Savali* which had a much smaller circulation. It's likely that more people actually read the most available *Samoa Observer* than the *Savali*.

Response to the Privy Council Ruling

The *Samoa Observer* covered the case of Falemaʻi Lesa in considerable detail. Despite the significance of the ruling, the initial tone of its reporting was cautious, rather than triumphalist. Possibly, given New Zealand's colonial history in Samoa, its writers may have sensed its government would be concerned about the Privy Council judgement. Whereas the New Zealand media were generally critical of the ruling, suggesting the Privy Council had misread the original intention of the 1928 Samoa Citizenship Act, the *Samoa Observer* largely endorsed the ruling.

Initially, the *Samoa Observer* was cautious in its response, treating the London announcement as a legal matter rather than a cause for political celebration. The paper's report highlighted the constitutional nature of the ruling, the gravity of the Privy Council's proceedings, and the fact that it was determined according to New Zealand's then legal procedure:

> The Privy Council, in a decision with major implications for Western Samoans in New Zealand and Samoa, has ruled that a Wellington woman, Falemaʻi Lesa…is a natural-born British subject… Lord Diplock, who presided over the judicial committee, said it would give the reasons for its decision later. He described it as a 'very important case.'… Lord Diplock said that, if it was conceded that Western Samoa came within 'His Majesty's dominions,' he thought it necessarily followed that a person born there was a British subject.[242]

The calm tone of this report presented the decision as a just fulfilment of long-overdue legal commitment rather than opening the way for a big wave of emigration to New Zealand. Samoan Prime Minister Vaʻai Kolone was similarly restrained in his initial statements, framing it primarily as a matter for the New Zealand government:

> Since the Privy Council decision was brought down three days ago, government has kept itself informed of developments on this important matter.
> The laws involved in this case are New Zealand legislations and consequently the legal points at issue are matters for the New Zealand judicial system.[243]

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[241] Ministry of the Prime Minister and Cabinet, "*Savali Newspaper*," Government of Samoa. Accessed March 9, 2026. https://mpmc.gov.ws/divisions/press-communications/savali/

[242] "Samoan Wins Historic Test Case before Privy Council," *Samoa Observer*, July 28, 1982, p. 4.

[243] "PM Comments on P.C. Ruling," *Samoa Observer*, July 21, 1982, p. 1.

Despite the note of cautious restraint, the *Samoa Observer* cited the swiftness with which the Privy Council reached its decision as appropriate recognition of the underlying issues of justice raised by Falema'i Lesa's case:

> But the reports that the Privy Council took all but 20 minutes after the New Zealand Solicitor General had made his submissions to pass down its ruling surely indicates that although in an issue as important as this, the council in London was already adamant that the harassment of overstayers in New Zealand had got to end.
>
> The decisiveness of the ruling taking into account the deplorable conflicts between minority societies in England and Britishers is overwhelming. A tribute to those people in society who are unswayed from their dedication to the fundamental concept of human rights and justice, is merited.[244]

Derek Round's article "Samoan Wins Historic Test Case Before Privy Council" discussed, over several pages, the significance of the ruling. Round was a very experienced journalist who, an online biography noted, "was Asia correspondent for the New Zealand Press Association in Singapore and Hong Kong during the 1970s," and "later worked as a political editor in the parliamentary press gallery and as London bureau chief."[245] Round observed that Lord Diplock called it a "very important case". The detailed nature of the article suggests that the reporter saw the decision as a win for Falema'i Lesa but a decision that affected the status of all Samoans under New Zealand law.[246] The article also noted that costs were also awarded to Falema' i Lesa.[247]

In contrast to the welcoming tone of reporting on the Privy Council decision, the responses of the New Zealand government soon attracted criticism. An article, "Halt on Temporary Permits for NZ" (21 July 1982), reported the New Zealand Government's first procedural response to the ruling was restrictions aimed at limiting Samoan access to New Zealand. The *Samoa Observer* noted New Zealand had "clamped down on the issuing of visiting permits" with Samoans visiting the New Zealand High Commission in Apia being informed "that no permits would be issued for the next two weeks."[248] The article emphasized the confusion caused by this rapid response because New Zealand officials offered no explanation for the halt on permits. Moreover, they claimed to have not yet been "advised officially" of the Privy Council decision, and provided no clarification as to whether the restrictions only concerned Samoans or all applicants. By reporting the halt on permits immediately, the *Samoa Observer* pointed out the difference between the Privy Council's legal support of Samoans' rights and New Zealand's prompt procedural response, which sought to limit the ruling's effects.

The *Samoa Observer* also relayed perspectives from New Zealand to its readers. Citing Wellington newspapers the *Dominion* and *Evening Post* it noted Labour MP Richard Prebble's

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[244] "From Dawn Raids to Hostility," *Samoa Observer,* September 22, 1982, p. 14.

[245] "Derek Round," Wikipedia, (accessed Jan 19, 2025), https://en.wikipedia.org/wiki/Derek_Round

[246] Derek Round, "Samoan Wins Historic Test Case Before Privy Council," *Samoa Observer*, July 28, 1982, p. 4.

[247] Derek Round, "Samoan Wins Historic Test Case Before Privy Council," *Samoa Observer*, July 28, 1982, p. 4.

[248] "Halt on Temporary Permits for NZ," *Samoa Observer*, July 21, 1982, p. 1.

suggestion that stripping Samoans of New Zealand citizenship would "result in the government being taken to the International Court." The article later reported Prebble's observation that the Privy Council ruling:

> Would directly or indirectly confer New Zealand citizenship rights on most people in Samoa-up to 160,000 people.
>
> He said the many Samoans who had been sent home as overstayers by the government had been wrongfully deported, and would certainly have a case against the government.
>
> The case indicated that the government had made a foul-up of its citizenship laws and the matter was not a minor one which could be solved by a "little act of Parliament" because two sovereignties were involved, Prebble said.[249]

By contrast the National Party government's Minister for Immigration Aussie Malcolm restated his party's scepticism of the ruling while acknowledging its significance. He further argued the ruling was contrary to "common sense":

> The New Zealand Minister of Immigration, Mr Malcolm, however, said the decision of the Privy Council was extraordinary in his view in that it "does not seem to bear much relationship to commonsense."
>
> He said that whatever the legal arguments put forward in London, most people in New Zealand and most people in Samoa would agree that the two countries, while friendly, were separate nations.
>
> "New Zealanders don't claim to be Samoans and Samoans are not New Zealanders," he said. He did find though that the ruling was "probably the most important constitutional case in New Zealand's legal history."[250]

The *Samoa Observer* suggested that the underlying motivation for the ban on temporary permits to New Zealand reflected fears of an "exodus from Western Samoa to New Zealand."[251] Such an "exodus" it noted had potential implications for New Zealand's relations with Australia, because immigration to Australia from New Zealand was already a source of political tension between the two nations:

> The Australian High Commissioner, Nick Fraser, was not available for comment yesterday but it is understood that the ruling has also caused concern to the Australian government. Reports from Australia say that the Australian government was likely to be pressured into introducing work permits for New Zealanders because of the ruling. New Zealand passport holders travel freely to Australia. The concern is that newly-arrived Samoans to New Zealand with New Zealand passports would be crossing over to Australia.[252]

Such concern reflected wider developments in trans-Tasman migration system. From 1973, under the Trans-Tasman Travel Agreement, Australians and New Zealanders had open access

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[249] "Visa Ban Continues as Debates on Ruling Flare Up," *Samoa Observer*, July 28, 1982, p. 1.

[250] "Visa Ban Continues as Debates on Ruling Flare Up," *Samoa Observer*, July 28, 1982, p. 1.

[251] "Visa Ban Continues as Debates on Ruling Flare Up," *Samoa Observer*, July 28, 1982, p. 1.

[252] "Visa Ban Continues as Debates on Ruling Flare Up," *Samoa Observer*, July 28, 1982, p. 1.

to each other's countries and could claim social welfare entitlements available to each other's citizens. By the early 1980s, there were many more New Zealanders living in Australia than Australians living in New Zealand, exacerbating the already fractious relationship between the respective governments.[253]

In addition to referencing government perspectives on the privy council decision, the *Samoa Observer* also published commentary from New Zealand that similarly raised questions about what the Privy Council ruling could mean for Samoan politics and authority by the constitution. On July 28 the *Samoa Observer* published a letter from Auckland based Eric Liddle "Lighting the Fire" stating that if the ruling legally created "100,000 people in Samoa, New Zealand citizens by right of birth" it could in fact weaken the main rules that shape Samoa as a state and decide who could hold political rights. The letter described the decision as a constitutional crisis, in terms of Samoa's own citizenship laws, which state that "no one can be a Matai or a member of Parliament unless he or she is a Samoan citizen." Liddle warned:

> As 2/3 of the population of Samoa are New Zealand citizens by right of birth, is it constitutional that the minority rules? As it seems that only the youngest of the population are true Samoans by right of birth, is the present Government stepping down to allow the true Samoan to stand for parliament?[254]

The crucial issue in all this, though, is that the case raised not just questions about immigration and overstayers but questions about the legitimacy of the government and national sovereignty. Rather than celebrating the ruling, this letter argued that the decision positioned the Privy Council judgement as a potential catalyst for constitutional instability rather than as a simple affirmation of citizenship rights for Samoans. One reason for opposition to the Privy Council decision stemmed from a concern that Samoa's relationship with its former administering power through its constitution was somehow stronger than realised. Even with citizenship rights a central issue, the ruling also sparked anxiety that a foreign court could dictate Samoan rights. Some felt this meant Samoa could no longer govern itself without intervention from outside courts. In the words of the *Samoa Observer* at the time:

> The decision, however, opens up room for some debate on how much the independent state of Western Samoa values its sovereignty which the decision appears to be targeting on. Perhaps Samoans now eligible for New Zealand citizenship may be interested to know what the Western Samoan law has to say about the matter.[255]

Comments such as these indicate that the decision was perceived as not just a clarification of the law but one which possibly put New Zealand's judicial supremacy over Samoa's constitutional rights. In this respect, the decision of the Privy Council was regarded as being anti-Samoan and as threatening Samoa's sovereignty and that of its government.

The Privy Council ruling did not simply provoke criticism of New Zealand officials but also highlighted divisions in Samoan public opinion about who could speak on the community's

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[253] Denis McLean, *The Prickly Pair, Making Nationalism in Australia and New Zealand,* (Dunedin: Otago University Press, 2003), p. 290. Phillipa Mein Smith, "The Tasman World," in Giselle Byrnes, ed., *The New Oxford History of New Zealand,* (Melbourne: Oxford University Press, 2009), p. 317.

[254] Eric Liddle, "Lighting the Fire," *Samoa Observer*, July 28, 1982, p. 2.

[255] "New Zealand Citizenship Agreement Signed," *Samoa Observer*, August 31, 1982, pp. 1-2.

behalf. One letter to the editor of the *Samoa Observer*, "Emotional Trash?" referenced an extended correspondence with one Mr Forsythe, which criticized the legitimacy of complaints from "Western educated Samoans." In response to Forsythe's comments the correspondent asserted:

> There are many true Samoans who did not receive a 'formal Western Education'. They are neither ashamed nor bitter about it. On the other hand there are also Samoans who emigrated to New Zealand as unskilled workers, took advantage of Education opportunities offered and have returned and are now making useful contributions to our country... Sir, I enjoy reading letters containing intelligent, logical and well-reasoned views. But please, no more of the pseudo-intellectual, charlatanic emotive trash of which Mr. Forsythe is so capable.[256]

In framing Forsythe's words as "pseudo-intellectual... emotive trash," this letter suggested that the true danger for Samoan solidarity was not Western education but internal hostilities from rejection, insecurity and feeling superior to others. In this way, the *Observer's* letters page functioned as a space in which cultural impacts of the Privy Council decision were negotiated alongside its legal and political effects.

Criticism from prominent New Zealand figures was also reprinted in the *Samoa Observer*. One article "Legislation Passed Under Protest" noted that the actions of the New Zealand Government were opposed by leaders within the New Zealand trade union movement. Jim Knox, President of the Federation of Labour, was quoted as follows:

> If this government continues to legislate away the effects of judicial decisions, it will do away with the rule of law in New Zealand and undermine the basis of our system of government, a strong independent judiciary... fascism is not coming to New Zealand, it's arrived.[257]

By quoting Jim Knox, the *Samoa Observer* was able to draw attention to problems facing Samoans which were much broader than their rights or status. This article implied that the issues created by the legislation were no longer restricted to immigration, or the relationship between New Zealand and Samoa, but the more fundamental question of whether the highest court in the land could be independent of the government.

Opposition to the Citizenship (Western Samoa) Act was also framed by the *Samoa Observer* through reference to previous discriminatory immigration policies, especially as they were targeted at Samoan women. In its reporting on protests in New Zealand, the *Samoa Observer* quoted Foni Retzlaff, who said that supporters of the bill agreed that New Zealand's immigration policy was unjust. Retzlaff claimed the law had re-opened past wounds and that "memories of pregnancy tests that had been given Samoan women wanting to move to New Zealand and of the Lafos test were being rekindled in New Zealand."[258] The newspaper drew on this discriminatory history to place the Act within a long history of racial bias.

The *Samoa Observer* informed readers that a petition with 20,000 signatures presented in New Zealand by Foni Retzlaff and Mrs Georgina Moore of the Tagi-i-Iima Forum, was submitted to Parliament by Labour MP Helen Clark. This suggested that Samoan protest was recognized as

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[256] "Emotional Trash?" *Samoa Observer*, July 28, 1982, p. 2.

[257] "Legislation Passed Under Protest," *Samoa Observer,* September 15, 1982, p. 1.

[258] "Legislation Passed Under Protest," *Samoa Observer*, September 15, 1982, p. 1.

both organized and legitimate by New Zealand politicians, and had been debated in parliament. Accordingly, it reflected deeply held convictions rather than spontaneous protest actions.[259]

Criticism of the Citizenship (Western Samoa) Act and Racism in New Zealand Society

Many articles in the *Samoa Observer* identified the ways in which the government's response to the Privy Council ruling, along with media reporting, had engendered expressions of racism in New Zealand. "The Siege That Never Was," an article in the *Observer* by New Zealand based correspondent Michael Field, characterized the Act not as a solution to a messy legal problem, but as a betrayal of Samoans in New Zealand to white panic and racist prejudice. The editorial criticized the Government for acting not out of constitutional obligation but out of racialized political panic incited by hostile public opinion and misrepresentations of Samoans:

> The Citizenship (Western Samoa) Act is a victory for the bigots of New Zealand society; those who believed the people of Falefa and Safotu, Fa'asaleleaga and Aleipata were queuing up for the doubtful pleasures of unemployment in Otara and Porirua... That New Zealand's National Party Government ganged up with the opposition Labour Party to give expression to this curse on Samoans has deeply hurt the 40,000 Samoans who live here.[260]

The *Samoa Observer* challenged the *New Zealand's Herald's* view that the Act was a neutral legal response by highlighting the fears and prejudices expressed towards Samoans living in New Zealand. The paper argued that political leaders succumbed to popular hostility toward Samoans instead of treating the bill as only a minor change. Racial fear, as exposed by the *Samoa Observer,* had driven the debate, and it was argued that the Act had been created out of unfairness instead of following basic legal principles. In this light, the Act was not seen as an isolated piece of legislation, but rather as part of a long pattern of unfair treatment of Samoans in New Zealand.

In a direct rejection of the *New Zealand Herald's* framing of the Act as a neutral constitutional correction, "The Siege That Never Was" editorial made clear links between the Act and the injustices of the colonial past, suggesting that New Zealand had only accepted Samoans when they conformed to idealized notions of Pacific Peoples featured in tourist promotions:

> They should have learnt from O. F. Nelson and the "Mau" that New Zealand, from its hundreds of unemployed school-leavers to its highest Parliamentarians, only like a Samoan as long as he remains native- like in the picture postcards from Apia.[261]

It rejected the *New Zealand Herald's* claim that the Act corrected the status quo, instead characterizing the Act as an act of racial exclusion and shame:

> If Black Saturday did not teach Samoans something about New Zealand, this should make it clear that they are not wanted in New Zealand. Samoans will naturally feel bad about that, but in the end it is New Zealand's loss. Most of

[259] "Legislation Passed Under Protest," *Samoa Observer,* September 15, 1982, p. 1.

[260] "The Siege that Never Was," *Samoa Observer,* September 22, 1982, pp. 1-3.

[261] "The Siege that Never Was," *Samoa Observer,* September 22, 1982, pp. 1-3.

> England became senile long ago and the Pacific is the new child of the world. New Zealand had decided between the past and the future and it looked back.[262]

The pattern of drawing historical connections was particularly evident in another article "From Dawn Raids to Hostility."[263] Instead of treating the Privy Council ruling, public backlash, and the impending Act as an isolated administrative shock, the article set them within a longer context of discrimination against Samoans in New Zealand, including the Dawn Raids of the 1970s. The article portrayed the Privy Council ruling not as a legal accident that confused the status of Samoans in New Zealand, but as an administrative flashpoint that exposed New Zealand's mistreatment of Samoans. The 1982 Act on the other hand was a way of repeating history once again:

> The shock of the Privy Council ruling will not wear off quickly from the minds of New Zealanders. Just as it was not easy for them to comprehend the fearful suffering of island overstayers at the mercy of dawn squads, sniffing dogs and prowling policemen who eventually shoved them off into the isolation of prison cells.... All of a sudden, the New Zealand government is now seeing with eyes wide open.[264]

The article's reference to the Dawn Raids in a history of New Zealand's mistreatment of Samoans differed sharply from the coverage in New Zealand newspapers, which was mostly focused on legal issues and restrained in tone. For Samoan journalists, the 1982 Act was not the end of a "muddle," (as some New Zealand newspapers had characterized the legislation) but the resurgence of a racialized form of policing that the Privy Council judgment briefly challenged.[265]

Racism towards Pacific Peoples in New Zealand following the Privy Council ruling was a recurring theme in the *Samoa Observer*. An article, "Hostility Against Samoans Follows Privy Council Ruling," documented racist public reaction in New Zealand to the Privy Council ruling and the pending Act. Unlike the *New Zealand Herald,* which only referenced hostility towards Samoans in passing, this article did not shy away from explicitly racial reactions from New Zealanders:

> Island people were rounded up by the New Zealand Police using such tactics as "dawn raids," "random checking" on the streets and sniffing out by trained dogs for islanders who had overstayed their permits. As early as last week, a Tongan woman with children, one of whom was a baby she was breast-feeding, was taken from her by the police for two days with the explanation that she was an overstayer," reliable reports from New Zealand said.[266]

The article used these reactions as evidence of the intensity of public hostility that the New Zealand Government did little to control. Michael Field was quoted in the article: "The ruling was widely covered by newspapers there, television and radio and that on radio talk back

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[262] "The Siege that Never Was," *Samoa Observer,* September 22, 1982, pp. 1-3.

[263] "From Dawn Raids to Hostility," *Samoa Observer,* September 22, 1982, p. 14.

[264] "From Dawn Raids to Hostility," *Samoa Observer,* September 22, 1982, p. 14.

[265] From Dawn Raids to Hostility," *Samoa Observer,* September 22, 1982, p. 14.

[266] "Hostility against Samoans follows Privy Council Ruling," *Samoa Observer,* July 21, 1982, p. 1.

programmes, New Zealanders have been screaming: 'We don't want Samoans coming here. They can stay back in their own country.'"[267]

A later article quoted Broadcasting Minister Le Mamea Ropati stating "much hostility has been shown Samoans living there since the deliverance of the Privy Council ruling last month" and that "some '95 per cent of the New Zealand public' were pushing for the nullification of the Privy Council ruling."[268] Much of the hostility was attributed to fears of an influx of Samoans to New Zealand. An article on July 28 noted "In New Zealand, predictions are that the New Zealand government would pass special legislation to prevent an exodus from Western Samoa to New Zealand."[269]

In contrast to the way the New Zealand press represented themselves as neutral actors who recounted how the government was navigating an accidental legal difficulty, Samoan newspapers accused New Zealand media of actively igniting racial fear in New Zealand and legitimizing discriminatory political responses. In an article entitled "Feesago Blasts Anti-Samoan Cartoon," the *Samoa Observer* reported the High Commissioner's office had reprimanded the *New Zealand Herald* for a Gordon Minhinnick cartoon that cast Samoans as gold-digging opportunists who were flooding New Zealand.[270] The article quoted the High Commissioner as saying the cartoon was "racist, if not highly offensive," and also criticized the Herald for its more general coverage of Samoans. "The Herald has played a major part in creating New Zealand-wide fears of a 'flood' of thousands of Samoans coming to New Zealand… The cartoon… was, to say the least, if not racist, certainly highly offensive."[271]

In addition to highlighting the ways in which the New Zealand government's response to the Privy Council ruling engendered racist statements in New Zealand, the *Samoa Observer* took issue with the New Zealand government's claims they were acting in the 'Pacific Way' (adopting a consultative approach) in their response to the ruling.[272] Referring to the way the New Zealand government had presented the select committee hearings Michael Field remarked:

> Days later the committee chairman, Mr Peter Wilkinson, could get up and talk of the "Pacific Way." He had, after all, endured listening to Samoans going on at length in a language he could not, and did not want to, understand. Sure, like General Richardson's men, it was done in a hurry, but the New Zealand way involves cutting the cackle and getting on with it. So Samoans dressed in their lavalava and

[267] "Hostility against Samoans follows Privy Council Ruling," *Samoa Observer,* July 21, 1982, p. 1.

[268] "Highest Court Ruling Faces Nullity," *Samoa Observer,* August 18, 1982, p. 1.

[269] "Visa Ban Continues as Debates on Ruling Flare Up," *Samoa Observer,* July 28, 1982, p. 1.

[270] Gordon Minhinnick's cartoon, "Shut the Door-They Are Coming in through the Window," published in the *New Zealand Herald* on July 22, 1982, p. 6, depicted Muldoon, Minister of Immigration Aussie Malcolm and Attorney General Jim McLay taking refuge in a room. Muldoon was depicted as straining to close the door to Samoans seeking entry and directing Malcolm to restrain Samoans seeking to enter the room through a window. McLay was depicted reading a newspaper article on the Privy Council ruling from behind a desk. A speech bubble above a telephone on the desk read "Australia calling … Fraser here." The Samoans seeking entry are depicted in a caricatured way, attired in traditional dress.

[271] "Feesago blasts anti-Samoan cartoon," *Samoa Observer*, August 4, 1982, p. 1.

[272] "Pacific Way on Quota," *Press*, June 2, 1989, p. 3.

> puletasi[273] and making a nice picture on television came to have their heads chopped off.[274]

The opposition of some Labour Party MP's to the bill was treated with a mixture of doubt and measured appreciation. Michael Field, a close observer of New Zealand politics, adopted a skeptical tone:

> The bill came back into the House from the committee, and it was here that Labour staged its only fight, a pale imitation of true opposition. They unsuccessfully moved it to be referred back to the committee for further consideration. Then came word from Labour's executive that the MPs should fight the bill. The MPs didn't like the advice and Mr Lange stood up and said Labour did not like the haste with which the bill was going through, but they would not vote against it. Party leader Mr Bill Rowling remained silent. Only Auckland MP Ms Helen Clark could not accept the position and said she would oppose it, but by the gentlemen's agreement which keeps the system operating, she was not prepared to force a division.[275]

Whereas much of the New Zealand media coverage had focused on the Citizenship (Western Samoa) Act as an important measure to uphold New Zealand's legal sovereignty, the *Samoa Observer* published a number of articles criticizing New Zealand's government's response as contrary to legal agreements. Herman "Foni" Retzlaff, a prominent lawyer who subsequently argued the legislation overlooked New Zealand's colonial rule over Samoa:

> The effect of the Privy Council's decision springs from the fact that by its actions and legislation, New Zealand considered itself our country's sovereign from 1928 to 1948. It cannot deny citizenship to its subjects born during that period since clearly we were not a sovereign state until our own Independence in 1962. It follows therefore that our own government cannot deprive persons born here in this period from applying for NZ passports, they need not apply for NZ citizenship since the Privy Council has held that they have always been a birth right and continue to be NZ citizens. The public at large have tended to confuse the right to citizenship with the application for a passport.[276]

A later *Samoa Observer* article 'Tearing Up Law and Order' echoed these views:

> And that decision, and the putting into practice of that decision, would outrageously make a mockery of the British Commonwealth system of law. The New Zealand Parliament would go down in history as the lawbreakers of the Commonwealth.[277]

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[273] A puletasi is a Samoan two-piece female dress consisting of a wraparound skirt (usually a lavalava) and its matching top worn traditionally to church or cultural ceremonies and formal events. Lavalava (also known as lava-lava) is a length of fabric wrapped around the waist, worn by both genders throughout Samoa and many other Oceanic nations. A commonly seen garment in Samoan daily culture, it can be everyday casual wear, as well as more formal when accompanied with other pieces of clothing.

[274] "The Siege that Never Was," *Samoa Observer,* September 22, 1982, p. 3.

[275] The Siege that Never Was," *Samoa Observer,* September 22, 1982, p. 3.

[276] "Whose Sovereign Now," *Samoa Observer,* August 18, 1982, p. 3.

[277] "Tearing Up Law and Order," *Samoa Observer,* August 18, 1982, p. 2.

Retzlaff further argued that the retrospective nature of the Citizenship (Western Samoa) Act was particularly problematic, noting its potential implications for Māori claims under the Treaty of Waitangi:

> Any judicial system that allows retrospective legislation can never be relied on again in any context and concerning any issue. If New Zealand retrospectively legislates against the Privy Council decision, in this type of issue, what is to prevent the Maori people (are they not the only true natives of Aotearoa?) from demanding similar legislation nullifying the Treaty of Waitangi? It can be argued that since all New Zealand citizens except perhaps the native Maori, are citizens only by force of law, can they not also be deprived of their citizenship by retrospective legislation? Any law then depriving only Western Samoans of citizenship must be discriminatory.[278]

New Zealand's Prime Minister Robert Muldoon featured prominently in the *Samoa Observer* coverage. When publicly explaining New Zealand's suspension of temporary visas for Samoans, Muldoon had blamed Samoa's unstable political climate. This framing was published in the *Samoa Observer* article "Muldoon Wants Talks After All." The article quoted Muldoon describing Samoa's political landscape as central to New Zealand's reaction:

> The relevant part of Muldoon's statement said: "We have got to look at this very carefully. It is very involved and clearly on the examination that we have made up until this point there are conflicts... and when we attempt to resolve those conflicts for the long term, we must have regard to the views of the Samoan government and people, and you have the unfortunate situation where the Samoan government at the present time is not firmly in office because there are various petitions and appeals taking place up there, one of which is in the hands of three New Zealand appointees who have yet to deliver a judgement. And so really, you have got a confused situation that will not be made clear for some time, and in the meantime in light of all the publicity, we do not think we should issue any general visas for travel by Samoans to New Zealand."[279]

Another article on August 18 noted:

> The celebrated wit of the New Zealand Prime Minister, Robert Muldoon, which has served him so well over the years has been noticeably absent since the deliverance on 18 July of the eye-opening ruling by the country's highest court, the Privy Council in London. Snatches of the old craftiness though had continued to appear in the man's early speeches and statements on the ruling, until now, we are not even worthy of the glimpses of brilliance emanating from the leader's profound intellect.[280]

An earlier article, "It was to be Expected,' referred to Muldoon by his first name, perhaps reflecting the personalized relationship some Samoans believed they had with the New Zealand Prime Minister:

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[278] "Whose Sovereign Now," *Samoa Observer,* August 18, 1982, p. 3.

[279] "Muldoon Wants Talks After All," *Samoa Observer,* August 4, 1982, p. 1.

[280] "Tearing Up Law and Order," *Samoa Observer,* August 18, 1982, p. 2.

> The Judicial Committee of the Privy Council ruling in favor of a Samoan overstayer in New Zealand prompted Rob Muldoon to seek discussions with our Government. The reported hostility from many New Zealanders towards Samoans leads Rob to push for immediate conversations.[281]

The article went on to situate Muldoon's response within the current New Zealand political scene, suggesting the citizenship issue was a welcome distraction from domestic tensions:

> A person who observes New Zealand's political scene would understand that Rob's government has faced significant pressure over an extended period. Trade Unions continue to push wage demands while companies impacted by the Price Freeze work to eliminate it. The Privy Council's decision for Rob works as a blessing in disguise because it provides him with an issue that deflects criticism from his government's performance while generating strong emotions among New Zealanders. Rob demonstrates a high level of expertise in manipulating public emotion. The 1975 election campaign showed how Rob Muldoon toppled the Labour Government by exploiting emotional concerns surrounding "the influx of Polynesians into New Zealand." Rob could capitalize on this issue to gain support as his party faces a precarious situation without a working majority. The Prime Minister must extensively research Samoan Government affairs before leaving for talks with Rob and his Government.[282]

Another *Samoa Observer* article, "The Young Turk Rises Again," was more scathing in its criticisms of Muldoon, characterising him as a leader who encouraged public bias and used the Privy Council ruling for his own political ends. The article, which was published on 5 August 1982, suggested that Muldoon had shifted the public's frustration onto Samoans, and used racist fears to strengthen his position at a time of domestic political pressure. The anonymous correspondent wrote that the ruling "unleashed anger and vermon [sic] from the New Zealand people" and accused Muldoon of using "methodical efficiency" to "ensnare Samoa into partnership in defying the Privy Council ruling". The article concluded that Muldoon had "engineered a veritable Swiss bank of political salvation from his own unpopularity."[283] The headline of the article suggested a familiarity with Rob Muldoon, whose first autobiography was entitled *The Rise and Fall of a Young Turk*.[284] Indeed, whereas New Zealand newspapers had tended to marginalise Samoan perspectives, Samoan newspapers demonstrated a detailed knowledge of New Zealand politics, society and culture.

Criticism of Samoan Government Responses

For the most part, the *Samoa Observer* was critical of the way in which the government of Samoa interacted with the New Zealand government following the Privy Council ruling. Vaʻai Kolone and his government were frequently criticized for what the newspaper perceived as their ineffective response to the Citizenship (Western Samoa) Act. On July 28 it argued Kolone should not have accepted an invitation to travel to New Zealand for talks with Robert Muldoon:

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[281] "It was to be Expected," *Samoa Observer,* July 28, p. 3.

[282] "It was to be Expected," *Samoa Observer,* July 28, p. 3.

[283] The Young Turk Rises Again," *Samoa Observer*, August 5, 1982, p. 2.

[284] R. D. Muldoon, *The Rise and Fall of a Young Turk*, (Wellington: A.H. and A.W. Reed, 1974).

> The Privy Council controversial ruling should be left to the New Zealand government. It should be handled by the New Zealand government alone.
>
> Prime Minister, Vaai Kolone, should not have accepted the invitation by New Zealand's Prime Minister, Robert Muldoon, to discuss the ruling. When Samoan overstayers were harassed in New Zealand, the New Zealand government did not invite the Western Samoan government to discuss how to deal with them.
>
> When the Privy Council ruling came, immediately issuing permits for Samoans to visit New Zealand was suspended. Was the Western Samoan government consulted?[285]

Whereas Kolone was extensively criticised, his political rival Tupuola Efi, who replaced him as Prime Minister, was treated more positively. He was presented as a more politically skilled leader than Kolone and as someone who understood how to deal with Muldoon. Shortly after the legislation was passed Michael Field suggested:

> The fear of Mr Muldoon's old friend Tupuola Efi, was readily apparent. Throughout the debate the thought that he might come to Wellington raised the same kind of fears the Shah's men felt when the Ayatollah decided to return to Iran.[286]

Field credited Efi with being more effective in mobilising opposition to the bill than Kolone:

> Tupuola played a strange role in the affair. Word of opposition in Samoa to the bill was slow in coming through, and when it did, it was given form and expression by Tupuola. He circulated his open letters to Mr Lange among journalists, lawyers, politicians and churchmen and they slowly began to realise what was going on. Tupuola was successful to the three main churches came out against the bill. Tupuola, even though not prime minister, was able to manipulate the New Zealand scene while Va'ai, preoccupied with his electoral petition, did not even try.[287]

An earlier article suggested Tupuola Efi accompany Kolone to New Zealand because of his perceived rapport with Muldoon:

> The Prime Minister must select someone with substantial political insight who understands Rob Muldoon's thought process to accompany him in discussions. Among Pacific leaders Tupuola Efi stands out as one of the rare individuals who can effectively engage in the political tactics of Muldoon. You must learn Muldoon's tactics to win out of the situation. Staunch government supporters are likely to reject this proposal. The Prime Minister's pride could experience harm from this suggestion.[288]

The article's suggestion that Tupuola Efi had a good rapport with Muldoon was not entirely unfounded. In his second autobiography, published in 1977, Muldoon described Tupuola Efi as a "young, volatile man who defeated the traditionalists."[289] Nevertheless he credited Tupuola

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[285] "Let's Just Sit and Watch," *Samoa Observer*, July 28, 1982, p. 2.

[286] "The Siege that never was," *Samoa Observer,* September 22, 1982, pp. 1-3.

[287] "The Siege that never was," *Samoa Observer,* September 22, 1982, pp. 1-3.

[288] "It was to be Expected," *Samoa Observer,* July 28, p. 3.

[289] R.D. Muldoon, *Muldoon* (Wellington: A.H. and A.W. Reed, 1977, p. 140.

Efi for having “kept his head” during the “overstayer situation” and suggested that by 1975 he had emerged as “a leader of Island opinion.”[290] “Personally”, he wrote “I like him as a man of high principle.”[291]

Muldoon's comments also offer a clue that despite tensions between the two leaders, Muldoon viewed Tupuola Efi as someone reliable in the Pacific community. By stating that Efi "kept his head" during the overstayer crisis, Muldoon was also crediting Samoa's head of government for handling a political situation that caused much tension between Samoa and New Zealand with care and compromise. Painting a picture of Efi as both a political revolutionary who "defeated the traditionalists" and as someone of "high principle" allowed Muldoon to cast him as an important voice of reason within Pacific Island politics. Thus Muldoon's recollections further indicate that the two politicians had developed at least some respect for each other which supported their continued communications amidst sensitive politics.

Perspectives on the Apia Protocol

The Apia Protocol received a mixed response from Samoan newspapers. The *Samoa Observer* repeatedly criticized the agreement, which it described as a betrayal of Samoans rather than a compromise. The *Savali*, however, was more cautious, seeking to present the Apia Protocol as a mutual agreement between the governments of New Zealand and Samoa. A *Samoa Observer* editorial on 15 September 1982, for example, challenged Secretary for Government Ma’ava Iulai Toma's claim in the *New Zealand Herald* that "the protocol does not deprive anyone of anything," stating instead that it was "the political means by which native Samoan birthrights have been quashed." Attempts by government ministers to provide reassurance were called "hypocrisy" by the editorial, which accused both governments of maintaining the falsehood that Samoans had given up nothing of value:

> The Western Samoan government’s support of the New Zealand government’s racist citizenship legislation right from the start is so unwavering that we are tempted to congratulate the government for it.
>
> Even as the controversial bill went into its final reading in the New Zealand Parliament this week, the government maintained that there was nothing wrong with the bill. Secretary for government, Ma’ava Iulai Toma, told the “New Zealand Herald” that “the protocol does not deprive anyone of anything.”
>
> How can this possibly be so if the Citizenship (Western Samoa) Act 1982 which was based on the protocol has now deprived more than 100,000 Samoans of their birthright?
>
> Or has the deception by the New Zealand government that the “Samoans cannot claim a right they never knew existed” been so naturally ingrained in the thinking bone of government that it cannot see anything else clearly.[292]

[290] Muldoon, *Muldoon,* p. 140.

[291] Muldoon, *Muldoon,* p. 141.

[292] “Loyal to the End,” *Samoa Observer*, September 15, 1982, p. 2.

One particularly appalling element in the Apia Protocol, it was suggested, was the absence of any provision for Samoans who had served in the New Zealand Armed Forces in the Second World War and their descendants:

> Did the government consider those Samoans who fought, not as Samoans, but as New Zealanders in the New Zealand forces in second world war, risking their lives, not for Samoa but for New Zealand? What about their children? Didn't they deserve a niche in the protocol?[293]

These themes of historical obligation and colonial connections were elaborated on in a letter to the editor from "Betrayed":

> It should be remembered however, that when New Zealand passed the legislation giving Western Samoans citizenship, status, they were administering us. They were therefore the government, and we, the subjects. To say now that we were never regarded as an integral part of New Zealand, may be arguing against historical realities at the time. While it is true that in the context today, and certainly since independence, we cannot be regarded as a part of New Zealand nevertheless, the people affected were born during New Zealand's administration period so that a good case can be submitted that these people are still citizens of New Zealand until they elect to revoke that status.
>
> We should never forget that some Samoans at the time also gave their lives fighting for New Zealand. Given our present obligation to the Anglo-Saxon system of law and order, we do have the right to object when a court ruling which has granted us a right (regardless of the fact that it is not our law) is being nullified with retrospective effect with our government's consent.
>
> No one has ever suggested that government should ignore the situation of Samoans in New Zealand by asking us whether or not we still wish to remain New Zealand citizens. Cabinet in fact, has from the start, ignored Samoans in New Zealand and are still doing it now. They never consulted those who fought for this right and the protocol is being condemned by the Samoans in New Zealand. To foster that argument as a justification for the protocol, is the biggest red herring that has ever been dragged across the minds of the Samoan people in recent times.[294]

In their article 'Legislation passed under protest,' *Samoa Observer* mentioned Foni[295] Retzlaff's criticism that the Apia Protocol limited legitimate opposition. Acknowledging that Samoan campaigners had enjoyed "a lot of support by the National Council of Churches, the Federation of Labour, Labour MPs and others," Retzlaff also held the view that the Protocol backed by the New Zealand government "has stifled any effort to oppose this act."[296] This critical perspective *allowed the Samoa Observer to show the Protocol* as a means to block opposition and to close down political space, and so continued its construction of the Citizenship legislation as imposed against organized and principled opposition.

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[293] "Loyal to the End," *Samoa Observer,* September 15, 1982, p. 2.

[294] "Betrayed," Letter to the Editor, *Samoa Observer*, September 15, 1982, p. 2.

[295] Misa Telefoni Retzlaff is also known as Telefoni / Foni Retzlaff.

[296] "Legislation Passed Under Protest," *Samoa Observer*, September 15, 1982, p. 1.

The *Samoa Observer* gave considerable space to Foni Retzlaff's complaints about the damaging impact of statements made by the Western Samoan government on the opposition to the Citizenship (Western Samoa) Act:

> Retzlaff, who arrived last night, had made a depressing statement that the bill publicity accredited to the Western Samoan government and front-paged by the New Zealand press did not assist the efforts in opposing the bill. He was referring to a front page story in the "New Zealand Herald" yesterday morning quoting the Secretary for Government Ma'ava Iulai Toma, as saying that the "protocol does not deprive anyone of anything." Retzlaff said this was totally untrue in that the New Zealand government had always insisted that it was the protocol on which the citizenship bill was based. Confirming that he had given this statement to the Herald, Ma'ava said yesterday that "the protocol speak(s) for Western Samoans as Western Samoan citizens and not for Western Samoans as New Zealand citizens.[297]

The exchange exposed a rift between Samoan activists and the Samoan government showing how New Zealand media echoed official promises that downplayed the legal results of the Protocol.

The *Samoa Observer's* 'Letters to the editor" page was one channel through which Samoans showed their concerns. "Betrayed," characterized Samoan resistance not as disloyalty or as grievance, but as a matter of democratic right:

> Just as the right to change New Zealand law is a matter for the majority of New Zealanders, so is the right for us to voice an opinion on this issue, a matter for the majority of Samoans, and not a handful of Cabinet Ministers, who according to Mr Muldoon have a dubious mandate to speak for the majority of Parliament.[298]

This letter reflected a widely held sentiment among Samoans that their objections had been denied a fair hearing and that everyday Samoans, the people most affected by the act, had been excluded from decision making in both Wellington and Apia.

Another attack on the Apia Protocol appeared in the letters to the editor page of the *Samoa Observer* from Sale Sesole who dismissed claims it did not materially affect Samoans:

> May I point out to DC that the deprivation is not "so-called" but a statement of fact. Otherwise why all the furore? The Protocol was also used by Mr McLay in the New Zealand Parliament to appease dissenting voices, even to the extent of implying that not to pass the Protocol is to favour those opposing the present New Zealand Government. How then can any sensible person claim that the Protocol did not contribute to the deprivation measures applied by NZ? Indeed, what would have been the point of the Protocol from NZ's point of view? ... According to DC, "we are behaving as if we don't have a country of our own to belong to." Cannot DC see that it is not a matter of physical belonging only? Samoans living in NZ, Hawaii, North America and so on still consider themselves Samoans. Many have

[297] Legislation Passed Under Protest," *Samoa Observer*, September 15, 1982, p.1.

[298] "Betrayed," Letters to the Editor, *Samoa Observer*, September 15, 1982, p. 2.

> retained Samoan citizenship and opted for permanent resident status only. The rest would definitely prefer dual citizenship if allowed.[299]

In printing this letter in full, the *Samoa Observer* again reflected a perception that the Apia Protocol was a tool of political pressure rather than a solution mutually agreed between New Zealand and Samoa. Moreover, it affirmed that Samoan identity and the claims that come with it were based on Samoan ancestry as opposed to their country of residence.

The *Samoa Observer* discussed public opposition to the Citizenship (Western Samoa) Act through extensive coverage of a major rally in Apia:

> More than 7000 people gathered on the Reclaimed Area Monday afternoon to lift up one voice they were being deprived of their birthright by the proposed amendment of the Privy Council ruling by the New Zealand government. They were explained the ramifications of the New Zealand proposed legislation by the Leader of the Opposition, Tupuola Efi, and the President of the Western Samoa Law Society, Ato Soni Fepulea'i... The central (view) was that of annoyance at the government for not keeping the public well-informed on the ramifications of the protocol.[300]

In linking protest to legal authority and politics, the report added: "The rally itself was designed to drum up public support for a petition against the legislation and organizers claimed to have gathered about 15,000 signatures." By mentioning the scale of the crowds and "birthright," the *Samoa Observer* presented opposition to the Protocol as principled and informed.

The *Samoa Observer* also mentioned Tupuola Efi's upcoming trip to New Zealand as a chance to improve the legislation, contrasting his hopes to Prime Minister Robert Muldoon's clear rejection of further talks:

> Tupuola Efi was planning to travel to New Zealand this week... He plans to present the petition to Muldoon who has made it clear that Tupuola would not change his government's decision. "If he does not agree then it will not affect the decision," Muldoon said. "The decision has been made, the protocol has been signed. If he would not agree, it would not undo the agreement." Replying to these comments, Tupuola said the main thing was that Muldoon was prepared to talk. "It means his door is open," Tupuola said.[301]

By comparing Muldoon's final claims against Tupuola's belief that discussion could still happen, the article conveyed the imbalance of power influencing the disagreement, while also expressing doubt that Samoa could gain concessions from the New Zealand government.

In contrast to the critical tone of the *Samoa Observer*, *Savali* used neutral language to present the Apia Protocol as part of the regular business of the government. An article on August 31 noted: "on Friday, 20 August 1982, at the Prime Minister's Office in Apia, an agreement was signed between the Government of Samoa and the Government of New Zealand concerning

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[299] Sale Sesole, "You Had Your Choice Why Prevent Others from Theirs," *Samoa Observer*, September 15, 1982, p. 3.

[300] "7000 Rally Against NZ Legislation," *Samoa Observer*, September 1, 1982, p. 1.

[301] "7000 Rally Against NZ Legislation," *Samoa Observer*, September 1, 1982, p. 1.

matters relating to New Zealand citizenship for Samoan people."[302] The neutral wording of the article omitted any reference to the alleged pressure placed on the Samoan government to agree to the Apia Protocol, indeed by the placement of "Government of Samoa" before "Government of New Zealand" in the article the reader may have led readers to believe it was a Samoan initiative.

Savali presented the Apia Protocol as a functional way to address the uncertainty left by the Lesa v Attorney-General case. Rather than portraying it as a major political manoeuvre, the article highlighted its administrative goals, stating that "the purpose of the agreement was to clarify and resolve the issue of New Zealand citizenship for Samoan people, particularly those residing in New Zealand."[303] It was further stated "The Samoan Government stated that the agreement was intended to provide certainty and prevent confusion among Samoan people both in Samoa and overseas. It acknowledged that many Samoans had questions about their rights following the Privy Council decision."[304] The constant use of the word "uncertainty" of the agreement, instead of recognizing that many Samoans saw the Privy Council decision as providing certainty about their status under the law.

A similar interpretation was evident in the reporting of Deputy Prime Minister Tofilau Eti's speech, which implied that the issue had raised concern amongst Samoan families: "He acknowledged that the issue had caused uncertainty among Samoan families, especially those with members residing in New Zealand."[305]

The article further highlighted that the agreement had come as result of consultation within the Samoan government and framed the protocol as an agreement between two friendly nations working together: "The Prime Minister of Samoa signed the agreement after consultations with Cabinet and senior officials."[306] *Savali'*s framing painted the protocol as a sensible administrative settlement for a muddled situation, not a political deal. However, *Savali* overlooked the issue that many Samoans thought the Privy Council ruling had settled their citizenship woes.

Savali further suggested the agreement was consistent with a longstanding pattern of friendly relations between Samoa and New Zealand.[307] Deputy Prime Minister Tofilau Eti's opinion was reported as follows:

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[302] "Sainia Feagaiga Niu Sila," translation. "New Zealand Citizenship Agreement Signed," *Savali,* August 31, 1982, p. 1

[303] "New Zealand Citizenship Agreement Signed," *Savali,* August 31, 1982, p. 1.

[304] "New Zealand Citizenship Agreement Signed," *Savali,* August 31, 1982, p. 2.

[305] "Sainia Feagaiga Niu Sila," translation. "New Zealand Citizenship Agreement Signed," *Savali,* August 31, 1982, p. 1.

[306] "Sainia Feagaiga Niu Sila," translation. "New Zealand Citizenship Agreement Signed," *Savali,* August 31, 1982, p. 1.

[307] ""Saunoaga a le Palemia Lagolago -Tofilau Eti," translation: "Address by the Deputy Prime Minister - Tofilau Eti," *Savali,* August 31, 1982, p. 2.

> Tofilau emphasised that Samoa and New Zealand share a long-standing relationship based on cooperation and mutual respect. He noted that the agreement reflected the spirit of friendship between the two nations.[308]

Simultaneously, Tofilau attempted to portray the government's decision as a compromise for Samoa's national interests rather than a decision made under foreign influence: “However, he assured the public that the Government’s actions were intended to safeguard Samoa’s national interests while maintaining good relations with New Zealand.”[309] In a somewhat softer tone, the article did recognize that there was some public concern over the Apia Protocol. Eti[310] asked people to “remain calm” and accept the Government in the handling of this matter.”[311] Somewhat paradoxically, the call for calm suggested the government was aware of public concern over the decision and, notwithstanding their public statements, did not regard the agreement as a mutually beneficial act of diplomacy.

Criticism of the haste with which the Samoan and New Zealand governments passed the legislation

The *Samoa Observer* strongly criticised the haste with which the Citizenship (Western Samoa) Act had been passed in their article "Why all the Rush" which criticized the rushed process adopted by the New Zealand government. The paper referred to this as a form of injustice and democratic failure:

> The manner with which the New Zealand proposal to rectify the Privy Council ruling had been rushed through from Wellington to Apia, back to Wellington and straight into the New Zealand Parliament in a record one-week hotfoots the imagination. The immediate picture that flashes into focus is that of a huddled massive bundle of humans being thrown aboard from camp to camp, herding up quickly and unquestioningly in the same chambers... If the New Zealand Parliament announces today that it has passed a (law) depriving thousands of Samoans of their birthright, after having ignored to listen to at least the views of those whose rights are to be mutilated, then the New Zealand government will have convinced everyone that it is a tyrant masquerading behind democratic principles.[312]

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[308] “Saunoaga a le Palemia Lagolago -Tofilau Eti,” *Savali*, August 31, 1982, 2. Original Samoan text for cited quotation: “E ui ina iai ni manatu eseese i lenei mataupu, ae ua taumafai le Malo e saili se auala e tausia ai pea le va fealoai lelei i le va o Samoa ma Niu Sila.
O lenei maliega e atagia mai ai le mafutaga umi ua leva ona iai i le va o Malo e lua, ma le galulue faatasi i mataupu e aafia ai le manuia o tagata o atunuu uma e lua.”

[309] “Saunoaga a le Palemia Lagolago- Tofilau Eti,” *Savali*, August 31, 1982, 2. Original Samoan text for cited quotation: “O le mea lea ua manatu ai le Malo e tatau ona faia se faaiuga manino ma faamaonia ina ia puipuia ai aia tatau ma le manuia o le atunuu o Samoa.
E ui ina iai ni manatu eseese i lenei mataupu, ae ua taumafai le Malo e saili se auala e tausia ai pea le va fealoai lelei i le va o Samoa ma Niu Sila.”

[310] Tofilau Eti Alesana

[311] “Saunoaga a le Palemia Lagolago -Tofilau Eti,” *Savali*, August 31, 1982, p. 2. Original Samoan text for cited quotation: “...ia tumau le filemu... ma faatuatuaina le Malo i le faatinoina o lenei mataupu.”

[312] “Why All the Rush,” *Samoa Observer*, September 1, 1982, p. 2.

By using a narrative of tyranny, the *Observer* stated that the law was rushed to bypass consultation, and was accordingly undemocratic. In that same article, the *Samoa Observer* did not limit its criticism to New Zealand alone but also rebuke the Western Samoan government:

> But all these views on the issue should be given the chance to be heard. Admittedly, the Western Samoan government failed to do this miserably. It failed its people. It should now realize that no government, unless it is dictatorial, can decide for any individual on matters as basic as human rights. The New Zealand government, on the other hand, cannot be forgiven for using misleading subtlety in achieving its goal. It is the sort of game gangsters and crooks play. We suggest that the New Zealand legislation should not be ratified if all the submissions on the issue are not given the time to be presented and heard. There is no chance then that the respect for the New Zealand government would be restored.[313]

Blaming both governments, the *Observer* did not present the issue as a diplomatic failure but as a joint democratic failure, in which speed, deception, and exclusion took place. It was not only the content of the Apia protocol which was criticized; the *Samoa Observer* also reported disapprovingly on what it characterized as its overly hasty drafting. An editorial, "Fooling All of the People All of the Time," challenged the claim that Samoa was given an ultimatum by New Zealand, reporting they had been denied by both New Zealand officials and Muldoon himself:

> Certain information has since reached the Samoan public which, in essence, contradicts the situation as put out by the Government... Mr Muldoon has also since apparently told a local journalist that he was prepared to take time in resolving the citizenship issue, as he called it, “in the Pacific way.” Yet there has still been no substantiation by the government of its original claim that there had indeed been a deadline given Vaai Kolone by Robert Muldoon. On the contrary, Mr Muldoon reportedly said on TV in New Zealand that it was Vaai Kolone who had insisted New Zealand received his government’s response “within three days.”[314]

In repeating these inconsistencies, the *Samoa Observer* claimed the Apia Protocol was created in a context of secrecy, rather than transparency. This had the effect of dismissing arguments that the Agreement had been protective of Samoan interests. Therefore, Muldoon's claim that he was willing to take time to resolve the issue was not seen as appeasing. Rather it appeared to be contradicted in practice by the rushed signing of the protocol.

Summary

This chapter has identified a range of opinions about the Citizenship (Western Samoa) Act 1982 in Samoan print media, the majority of the coverage being critical. *The Samoa Observer* labelled the act as a moral and political failure rather than a practical legal solution. Initially, the *Samoa Observer* took a cautious stance in its reporting of the Lesa Privy Council decision. It reported on the growing criticism of the decision in New Zealand and the initial response of the New Zealand government in limiting visas between New Zealand and Samoa and effectively seeking to overturn the ruling through the Apia Protocol. Upon receiving information on the content of

[313] “Why All the Rush,” *Samoa Observer*, September 1, 1982, p. 2.

[314] “Fooling All of the People All of the Time,” *Samoa Observer*, September 1, 1982, p. 3.

the legislation and the reluctance of the New Zealand government to respond to submissions criticizing the act, the *Samoa Observer* connected the Act with racial resentment towards Samoans in New Zealand and previous discriminatory policies including the Dawn Raids. The *Samoa Observer* also criticized the Samoan Government, its editorials and articles highlighted fault-lines between how Samoa's leaders represented and interpreted the Apia Protocol and how many of its citizens and political opposition viewed that same agreement. The *Savali* was more moderate in its coverage. As a government newspaper, it sought to present the Apia Protocol as the result of mutual agreement between two nation states. The strength of public reaction, including a petition of approximately 20,000 signatures opposing the act and a large demonstration outside Parliament arguably suggests a majority of Samoans favoured the more critical position of the *Samoa Observer.* Overall, Samoan coverage of the 1982 legislation and Apia Protocol contrasted markedly with the generally positive way in which the New Zealand print media characterized the act. The political tensions and emotional hurt created by the legislation did not disappear. Indeed, there were ongoing campaigns for its repeal, which are discussed in the following chapter.

CHAPTER FOUR: Repeal of the Citizenship (Western Samoa) Act

The Protest against the Citizenship (Western Samoa) Act did not end with the passing of the legislation and the signing of the Apia Protocol. Samoans continued to voice their opposition to the legislation, eventually securing its repeal in 2024. This chapter focuses on how New Zealand and Samoan media reported Arthur Anae's petition to repeal the legislation in 2002 and its subsequent repeal in 2024. To some degree, the repeal of the legislation reflected the greater presence of Pacific peoples in New Zealand society and politics. It will be recalled, that in 1981 New Zealand's Pacific Island population numbered 88,794, approximately 2.8 per cent of the population.[315] By 2023, 442,632 New Zealanders (8.9 percent of the population) identified as being of Pacific Island ancestry.[316]

In addition to the growing numbers of Pacific Peoples in New Zealand, by the twenty-first century Pacific peoples were becoming more involved in decision-making. As this chapter will demonstrate, one important element of both the 2002 and 2024 campaigns was the involvement of New Zealand politicians of Pacific Island ancestry. Whereas there were no Members of Parliament of Pacific Island ancestry when the Citizenship (Western Samoa) Act was passed in 1982, by 2002 there were four: Taito Philip Field; Mark Gosche and Luamanuvao Winnie Laban from the Labour Party and Arthur Anae from the National Party.[317] In 2024 there were seven: Fa'anana Efeso Collins and Teanau Tuiono from the Green Party, and Barbara Edmonds; Jenny Salesa; Carmel Sepuloni, Lemauga Lydia Sosene and Tangi Utikere from the Labour Party.[318] New Zealand's first MP of indigenous Pacific Island ancestry was Taito Philip Field, who was elected in 1993.[319] Mark Gosche was elected in 1997 and Luamanuvao Winnie Laban in 1999.[320] Having Pacific MPs meant that conversations about the Act were coming not only from a Pākehā perspective but also from people who had Pacific cultural understandings and experiences. As a result of Pacific MPs, there was not only more push for redress but also how the 1982 Act was described. What New Zealand newspapers had generally presented in

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[315] Government of New Zealand, "Birthplaces and Ethnic Origin," *New Zealand Census 1981,* vol. 7, Wellington: Department of Statistics, 1983, pp. 76-83. The 1980s, (Manatū Taonga - Ministry for Culture and Heritage), updated 22-Sep-2025. URL: https://nzhistory.govt.nz/culture/the-1980s/overview

[316] "2023 Census population counts (by ethnic group, age, and Māori descent) and dwelling counts" May 29, 2024. https://www.stats.govt.nz/information-releases/2023-census-population-counts-by-ethnic-group-age-and-maori-descent-and-dwelling-counts/

[317] New Zealand Parliament, "Pacific MPs in the New Zealand Parliament, 1993 onwards," May 8, 2024, https://www3.parliament.nz/mi/visit-and-learn/mps-and-parliaments-1854-onwards/pacific-mps-in-the-new-zealand-parliament-1993-onwards/

[318] New Zealand Parliament, "Pacific MPs in the New Zealand Parliament, 1993 onwards," May 8, 2024, https://www3.parliament.nz/mi/visit-and-learn/mps-and-parliaments-1854-onwards/pacific-mps-in-the-new-zealand-parliament-1993-onwards/

[319] New Zealand Parliament, "Pacific MPs in the New Zealand Parliament, 1993 onwards," May 8, 2024, https://www3.parliament.nz/mi/visit-and-learn/mps-and-parliaments-1854-onwards/pacific-mps-in-the-new-zealand-parliament-1993-onwards/

[320] New Zealand Parliament, "Pacific MPs in the New Zealand Parliament, 1993 onwards," May 8, 2024, https://www3.parliament.nz/mi/visit-and-learn/mps-and-parliaments-1854-onwards/pacific-mps-in-the-new-zealand-parliament-1993-onwards/

1982 as a necessary legislative and bureaucratic process slowly changed to being seen as a historical injustice which needed to be rectified.

Arthur Anae's campaign to repeal the Citizenship (Western Samoa) Act 1982

The 2002 move to repeal the Citizenship (Western Samoa) Act 1982 by Arthur Anae was a pivotal moment in the debate over Samoan Rights and New Zealand's trustee obligations to its Pacific Island counterparts. As the first Pacific Island National Party MP, Anae used his position to raise awareness of the plight of the Samoan community, who had been negatively impacted by the 1982 Act, which, as previous chapters have noted, had been widely perceived by the Samoan community as an action of intentional discrimination. Whereas New Zealand print media had generally been supportive of the 1982 act; they tended to be measured in their coverage of Anae's petition for repeal. On the one hand, there was some acknowledgement of the grievances many Samoans had about the act. On the other hand, considerable emphasis was given to the argument that it had occurred a long-time ago and time had moved on.

Some media coverage acknowledged earlier race-based concerns. The *Press* reported that the Privy Council decision had been "overruled soon after by the National Government of the day, alarmed by the prospect of a mass migration to New Zealand," revealing the political motivations that underpinned the original 1982 Act. [321] Such framings made sense of the 1982 Act as being driven by politicians' anxieties about migration rather than legal concerns. Highlighting fears about potential "mass migration," The *Press* made the interests of the state seem natural instead of interrogating how the Privy Council decision impacted on Samoans' rights.

Media coverage of the New Zealand government's response to the petition echoed their perspective that the issues raised by petitioners had already been addressed. Helen Clark, Prime Minister of New Zealand between 1999 and 2008, had maintained that the law was "unjust," however, a spokesman for the Government later played down calls for repeal by saying that "the issue was not handled well at the time, but there has been a lot of water under the bridge since then."[322] The year 2002 marked forty years of Samoan Independence and Helen Clark travelled to Samoa to commemorate the occasion. On June 4, 2002, at an address to a state luncheon in Samoa, Helen Clark apologized for the "inept and incompetent early administration of Samoa by New Zealand." In particular, she apologized for the 1918 decision to allow the ship Talune to dock in Samoa whilst carrying passengers infected with influenza (which subsequently perished 22% of Samoa's population). She also apologized for the shooting of unarmed protesters in December 1929 in which at least nine people died, including Tupua Tamasese Lealofioaana III.[323]

She did not, however, apologize for the Citizenship (Western Samoa) Act nor indeed any of the other historical injustices Samoans had experienced from New Zealand. Earlier in the year, on 12 February 2002 Helen Clark had also apologized to the New Zealand Chinese community for

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[321] Ruth Berry, "Samoans Petition for Repeal of Citizenship Law," *Press*, March 28, 2003, p. 3.

[322] Berry, "Samoans Petition."

[323] Helen Clark Apology to Samoa, Full text: Helen Clark's apology to Samoa *New Zealand Herald* 4 Jun, 2002. https://www.nzherald.co.nz/nz/full-text-helen-clarks-apology-to-samoa/65TV2LDV6S7HHIYRDCFSC5YOZI/

the racial discrimination they had experienced, in particular the poll tax levied on Chinese immigrants. In that address, she officially recognized the injustices of the past saying "I wish to announce today that the government has decided to make a formal apology to those Chinese people who paid the poll tax and suffered other discrimination imposed by statute and to their descendants."[324] One parallel between the apologies to the Samoan and Chinese communities was that the apologies were for actions in the distant past. So there was no apology for either the Citizenship (Western Samoa) Act or the racially charged rhetoric deployed by the New Zealand First political party against Asians during the 1990s. There are strong similarities between the apology to the Samoan and the apology to Chinese people. Both apologies were about injustices that occurred many years ago but failed to mention more recent injustices. This suggests that the more recent an issue is, the less willing the government is to apologize for it.

Many Samoan leaders believed that apology and citizenship were separate issues. According to Taulaola Tofilau, then Minister at Auckland's Newton Pacific Islanders Congregational Church,[325] "The apology was her initiative. This is something we feel we should rightly be granted."[326] In highlighting the disparity between symbolic and legal outcomes, the Anae petition highlighted ongoing government refusal to reverse the effects of the 1982 Act and opened the door for challenges in future decades.

Arthur Anae's campaign was launched in May 2002. Anae indicated he intended to circulate a petition seeking repeal of the legislation. The *Evening Post* reported Anae's intention was to secure equity of citizenship for Samoans in New Zealand rather than securing a symbolic apology that would not remedy previous injustices, quoting him as stating "people were much more interesting *[sic]* in having their New Zealand citizenship rights, upheld by a 1982 Privy Council ruling, returned."[327] The overall tone of the article was measured. Whilst acknowledging petitioners concerns on one hand, it also reported that two of Labour's three Pacific Island MP's, Taito Philip Field and Luamanuvao Winnie Laban opposed Anae's campaign on the grounds it might detract from Helen Clark's apology:

> Taito Phillip Field said while the Muldoon Government's actions were a "great injustice", time had moved on. Together with fellow list MP Winnie Laban, he felt it would be unfortunate if the "courageous" apology was overshadowed by Mr Anae's calls.[328]

As previously noted, Prime Minister Helen Clark had been part of a Labour Opposition who had supported the passage of the Citizenship (Western Samoa) Act, although Clark had voted against the legislation. The ambivalent stance of the two Labour Party MP's towards Anae's proposals suggests it remained a difficult issue for the Labour Party caucus. The *Post* also

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[324] Helen Clark, "Address to Chinese New Year Celebrations," Beehive.govt.nz, February 12, 2002, https://www.beehive.govt.nz/speech/address-chinese-new-year-celebrations#:~:text=I%20wish%20to%20announce%20today,statute%20and%20to%20their%20descendants

[325] Newton Pacific Islanders Congregational Church (PICC), founded in Auckland in 1947.

[326] Berry, "Samoans petition."

[327] Berry, "Citizenship, not apology - Samoan MP," *Evening Post,* May 31, 2002, edition 3, p. 2.

[328] Berry, "Citizenship, not apology," p. 2.

reported they had spoken to Tupuola Efi who "rejected Mr Anae's claims saying he didn't believe people wanted the matter pursued."[329]

The *New Zealand Herald* covered Anae's petition in more detail. Like the *Evening Post* article, it reported Anae's strong condemnation of the 1982 Act which he labelled the "blackest act in New Zealand history" and asserted it was "racially discriminatory because it denied New Zealanders their rights to come to New Zealand."[330] The *New Zealand Herald,* however, reported some additional details about Anae's plans, including his intention to appeal to the United Nations if his petition was rejected:

> He said if the Government did not respond positively and repeal the act, he would raise money for legal action, including sending the case to the UN commission. "If New Zealand doesn't sort this thing out, it's going to be very embarrassing for it if this thing goes to the Human Rights Court. It could be embarrassing for New Zealand internationally if the world saw that it passed a law in modern times which is totally racist."[331]

The *Herald* sought comment from Helen Clark who reportedly dismissed Anae's petition as "'outright mischief-making' because his stand was not even backed by his own party."[332] Anae confirmed he was acting in an individual capacity, the reluctance of his National Party colleagues to support him likely stemming from their party's historic role in having initiated and passed the legislation.

Despite the criticism Arthur Anae received from those holding political office, his petition received widespread support. The level of organization displayed in mobilizing support for the petition highlighted the depth of feeling against the Act within the Samoan community which kept the issue alive in New Zealand political debate in subsequent years.[333] Radio New Zealand reported on the presentation of the petition in measured terms: "Anae addressed thousands of Samoans at New Zealand's parliament to hand over a petition with 100-thousand signatures demanding that the act be repealed." Anae also framed the campaign as a human rights issue, connecting the legislation to broader forms of discrimination against Pacific peoples in New Zealand:

> New Zealand has an international reputation about human rights issues in other countries and yet has kept quiet about its own internal issues which contradict the international human rights covenants, namely the dawn raids by police with dogs during the 70's and the passing of the Citizenship Western Samoa Act of 1982.[334]

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[329] Berry, "Citizenship, not apology", p. 2.

[330] Francesca Mold, "Black Act Must Go, says Anae," *New Zealand Herald*, Jun 3, 2002. https://www.nzherald.co.nz/nz/black-act-must-go-says-anae/WYFTXFCZH3Z2E6ZMR3R6O5QZTM/

[331] Mold, "Black Act Must Go, says Anae."

[332] Mold, "Black Act Must Go, says Anae."

[333] "New Zealand Petitioned to Repeal Act Denying Samoans,' Dual Citizenship," *Radio New Zealand*, 28 March 2003. https://www.rnz.co.nz/news/pacific/142990/new-zealand-petitioned-to-repeal-act-denying-samoans'-dual-citizenship

[334] "New Zealand Petitioned to Repeal Act Denying Samoans,' Dual Citizenship," *Radio New Zealand*, 28 March 2003. 28 March 2003, https://www.rnz.co.nz/news/pacific/142990/new-zealand-petitioned-to-repeal-act-denying-samoans'-dual-citizenship

It was argued that this petition was significant as it shifted the debate on the issue. Previously discussed largely as a legal or political issue, increasingly the focus moved to how the Samoan community experienced the Act and how it related to human rights. Defended in 1982 as just and necessary, Anae's activism revealed this position as flawed and part of broader discriminatory practices. Whereas print media coverage of the Citizenship (Western Samoa) Act in 1982 had largely marginalized Pacific people's perspective, Radio New Zealand gave Anae's petition extended coverage and quoted him extensively.

Helen Clark sought to frame Anae's petition as reviving an issue which had already been resolved. When questioned about Anae's petition and the response it had engendered, Clark's office responded that "the Government is not intending to revisit it."[335] Indeed, far from acknowledging the discriminatory nature of the legislation, Helen Clark distanced herself from her previously expressed opposition, implying it may have been occasioned by youthful naivety: "Miss Clark says she had concerns as a young backbencher about the way the law change was handled, but says there was a strong will in Parliament in favour of proceeding with the legislation."[336] This suggests that from a political standpoint, the Labour Government remained cautious about continuing concerns among voters over large-scale immigration and, as a whole, maintained their previous stance on the act.

Indeed, newspaper coverage of Anae's campaign acknowledged ongoing public concern at the prospect of mass immigration from the Pacific Islands. The *Dominion Post* quoted Anae stating that had he persisted in his quest for an overturned ruling, it would have created a racist backlash: "All that would then have happened is the Opposition would have been howling saying the Government wants to bring in 180,000 Samoan people to go on the dole."[337] Anae was also under some internal political pressure. The *Dominion Post* noted that Anae questioned whether he was a National Party member when he criticized its "selective racism" regarding its immigration stance. For instance, he belittled the party's push to remove any Pacific quotas as an attempt to get rid of Pacific Islanders, saying it was a stab in the back of its Pacific population. He also suggested that the National Party was "piggy-backing" off the New Zealand First anti-immigration move.[338] The friction occurred when Anae threatened not to vote National if the party continued with anti-immigration policies, saying there was "no way" he would vote National at the next election if this continued.[339]

Although much of the coverage of Anae's petition was framed in a neutral manner, media reporting of its consideration by Parliament gave a platform to Samoan concerns about the 1982 Act. Parliament heard submissions on repealing the act in May 2003, including one from Anae and others who connected via live video link from New Zealand to Samoa to get their message across the ocean. According to *The Press*, when Parliament heard them later, he said, "This racially biased act is an insult to the people of New Zealand and must be removed."[340] By this time, Anae was aligned with the position of Dr. George Barton QC who served as one of Falema'i Lesa's legal lawyers in the original appeal to the Privy Coucil, ex-Human Rights

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[335] Radio New Zealand Newswire, "PM Not Intending to Revisit Samoan Citizenship Law," December 31, 2002.

[336] "No Headline," Radio New Zealand Newswire, 28 March, 2003.

[337] "Petition on Samoan Citizenship Rejected," *The Dominion Post*, May 21, 2004, edition 2, p. 5.

[338] "Anae Protests over 'Racism,'" *The Dominion Post*, February 20, 2003, edition 2, p. 2.

[339] "Anae Protests over 'Racism'," *The Dominion Post*, February 20, 2003, ed. 2, p. 2.

[340] Amanda Warren, "Samoans Seek NZ Citizen Rights," *The Press,* May 9, 2003, edition 2, p. 5.

Commissioner Pat Downey, and Samoan Ombudsman Maiava Iulai Toma who were like-minded figures opposing the legislation. The act was described by Samoan community leaders as a "blot" on New Zealand's legal history, one that "discriminates against Samoan people and contravenes the Human Rights Bill."[341] Confronting the Government Administration Select Committee, Arthur Anae was firm: "This racially biased act is an insult to the people of New Zealand and must be removed.[342] Community leaders also linked the Act to a longer pattern of injustice, reminding Parliament that "there are discriminatory events which have happened in this country that have not been acknowledged," including the Dawn Raids, whose "scars and the trauma ... remain."[343]

The petition failed to succeed even though it received significant support from both high-profile figures and the general public.[344] The committee ruled that there was "nothing wrong with the Act,"[345] describing it instead as simply standardizing Samoan residents' status with people from other former League of Nations territories, a perspective which disregarded Samoa's historical connection with New Zealand.

When his political avenues were exhausted, Anae sought international legal recourse, something which attracted further media attention. According to a 2005 article in the *Sunday Star-Times*, Anae and George Barton QC wanted to bring the case to the United Nations Human Rights Committee. Anae drew parallels between the 1982 Act and the dawn raids of the 1970s, asserting that "many of those who were deported were actually legal citizens, their lives disrupted due to bureaucratic injustice."[346] He stated that Samoans who were deported could ask for up to $2 million each for missed opportunities. "These people were denied their rights. Where would they be in society in New Zealand today had they lived here?"[347] This was a strong effort to make the issue known worldwide and put pressure on the New Zealand government to take responsibility, both morally and financially.

Arthur Anae's 2002 campaign was one of the rare occasions that a Pacific MP in the New Zealand parliament took on the discriminatory citizenship laws against Samoans. The reaction to Anae's petition demonstrated unwillingness from consecutive governments to address the grievances arising from the Citizenship (Western Samoa) Act. In contrast to 1982, when New Zealand media generally supported the Citizenship (Western Samoa) Act, in 2002 they took a more neutral position. Although unsuccessful, Arthur Anae's campaign arguably helped open space for future challenges to the Act.

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[341] Warren, "Samoans Seek NZ Citizen Rights," *Press,* 9 May 2003, p. 5.

[342] Warren, "Samoans Seek NZ Citizen Rights," *Press,* 9 May 2003, p. 5.

[343] Warren, "Samoans Seek NZ Citizen Rights," *Press,* 9 May 2003, p. 5.

[344] Leah Haines, "Petition on Samoan Citizenship Rejected," *Dominion Post,* May 21, 2004, p. 5.

[345] "MPs Ignore Call of Samoan Protesters," *Press,* May 21, 2004, p. 7.

[346] "Samoans seek Compo for Dawn Raids," *Sunday Star-Times*, July 31, 2005, p. 4.

[347] Ibid. See also, *Press*, "Samoans Seek NZ Citizen Rights," May 9, 2003, which echoes Anae's statement that the 1982 Act was a "blot on the statute books". Radio New Zealand Newswire, December 31, 2002, for multiple reports on Anae's public addresses and the 100,000-signature petition. *The Dominion Post,* May 21, 2004, "Petition on Samoan Citizenship Rejected," documenting the government's refusal and Anae's softened stance.

Samoa Media Responses to Arthur Anae's Petition

Arthur Anae's campaign to repeal the Citizenship (Western Samoa) Act 1982 received considerable coverage in Samoan media. Two narratives emerged in Samoan newspapers. In a similar pattern to the way the *Samoa Observer* and *Savali* covered the 1982 legislation, the *Samoa Observer* tended to be supportive of Anae's campaign, which argued repeal of the act was necessary for true reconciliation between New Zealand and Samoa. The government newspaper, the *Savali,* however, positioned itself as a more realistic voice. While acknowledging the ongoing emotions of historical injustice the legislation had created, it argued that the Samoan people would be better served by promoting a positive relationship with New Zealand in the present rather than seeking redress for past wrongs. The ways in which the respective newspapers perceived the apology of the New Zealand government also influenced their coverage of Anae's campaign. Whereas the New Zealand media tended to uncritically present the apology as a noble action, the Samoan media produced more subtle viewpoints in their coverage of both Clark's apology and Anae's campaign.[348]

The *Samoa Observer* reported extensively on the New Zealand government's apology and Arthur Anae's 2002 campaign to repeal the Citizenship (Western Samoa) Act 1982. Its coverage of Anae's campaign coincided with Helen Clark's apology for past colonial injustices. The *Samoa Observer* quoted her statement "I represent the New Zealand Government in extending today our formal apology to Samoa's citizens for the injustices produced during our administration in Samoa's past years."[349]

The *Samoa Observer* article entitled "Apology Good for Kiwis" conveyed Prime Minister Tuilaepa Sailele's opinion that the apology served as an educational tool for New Zealanders:

> Many New Zealanders were not aware of the injustices Samoans have suffered under New Zealand colonialism. The apology is an ideal venue to inform New Zealanders.[350]

Afamasaga Toleafoa's editorial "An Honourable Thing to Do" explored how state apologies carry political risks and implications. The debates about re-opening discussions of the Samoa–New Zealand immigration protocol matched Anae's advocacy efforts and highlighted how symbolic reconciliation can undermine necessary legal solutions.[351] As observed by Toleafoa:

> The New Zealand prime minister will be taking considerable political risk with a large section of the New Zealand electorate who will not agree with her "apologising". There is also no need to drag out the Immigration Protocol between Samoa and New Zealand at this time to cloud the issue.[352]

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[348] All quotations from *Samoa Observer* and *Savali* presented in this chapter were sourced from English language versions of those outlets. *Samoa Observer* has both English-language and Samoan-language content (typically called Gagana Samoa), though the latter is much shorter. *Savali* is Samoa's government newspaper, which today only rarely prints physical copies and primarily distributes its content online. Savali's content is also primarily in English.

[349] "NZ is Sorry," *Samoa Observer,* June 5, 2002, p. 1.

[350] "Apology Good for Kiwis," *Samoa Observer,* June 6, 2002, p. 1.

[351] Afamasaga Toleafoa, "An Honourable Thing to Do," *Samoa Observer*, June 2, 2002, p. 1.

[352] Afamasaga Toleafoa, "An Honourable Thing to Do," *Samoa Observer,* June 2, 2002, p. 1.

The *Samoa Observer* reported a range of perspectives. Tuiatua Tupua Tamasese affirmed that the apology would function as both personal and cultural healing. He stated "now every time I read, heard or even think about the events our ancestors went through under New Zealand's administrations, my heart cries."[353] In contrast, a news article titled "Reader opposes New Zealand apology" expressed strong disapproval. Ioana To'i of Vaitele-Uta wrote: "So no apology is fair enough... We want our rights."[354] The letter asserted political compensation should be prioritized over moral declarations. The author maintained that apologies which lack substantive change serve only to extend the duration of injustice.

The *Samoa Observer* published an article titled "6,000 march for N.Z. citizenship". It reported a protest march in Samoa intended to coincide with select committee discussion of Anae's proposal to repeal the Citizenship (Western Samoa) Act. Traditional chants accompanied a peaceful demonstration which included elders and clergy alongside youth as they marched toward the New Zealand High Commission to perform a unified civil protest. Leatiogie Leuluaialii Leota Le Ituau Ale began his declaration with the following words:

> *We, Samoa has* [sic] *gathered today, to ask the New Zealand government, to repeal the (Citizenship) Act so that it would enable our people to have the citizenship that is rightfully ours*.[355]

The above statement reaffirmed their belief that New Zealand's legal measures after the 1982 Privy Council decision effectively withheld from Samoans their birthright citizenship by positioning the issue as a justice concern instead of a matter of generosity. The Reverend Lotu Uele pointed out that the protest involved both political issues as well as spiritual beliefs. He argued Samoans had endured "sleepless nights" over the issue, and sought to reclaim what was "part of their rightful heritage."[356]

In a symbolic diplomatic act New Zealand High Commissioner Dr. Penelope Ridings received the petition and stated that it would proceed through "in its normal path" toward submission to the New Zealand Parliament. She emphasized the "strong relationship" between the two nations by referencing Prime Minister Helen Clark's 2002 apology.[357]

Whereas New Zealand newspapers had generally criticized the Privy Council in their 1982 articles on the Citizenship (Western Samoa) Act, the *Samoa Observer* connected the 1982 Privy Council decision, which confirmed New Zealand citizenship for all those "born in Western Samoa between 13 May 1924 and 1 January 1949,"[358] with previous government responses to Privy Council rulings. It noted that New Zealand's Parliament had reversed just four Privy Council decisions including two cases about Māori land ownership along with one concerning taxes and this particular ruling about Samoan citizenship. New Zealand officials deliberately chose to override the Privy Council decision which was not standard practice but instead

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[353] "NZ Apology a 'Spiritual Healing,'-Tuiatua," *Samoa Observer*, June 1, 2002, p. 7.

[354] "Reader Opposes New Zealand Apology," *Samoa Observer*, June 1, 2002, p. 7.

[355] "6,000 March for N.Z. Citizenship," *Samoa Observer*, March 27, 2003, p. 1.

[356] "6,000 March for N.Z. Citizenship," *Samoa Observer*, March 27, 2003, p. 1.

[357] "6,000 March for N.Z. Citizenship," *Samoa Observer*, March 27, 2003, p. 1.

[358] New Zealand Department of Internal Affairs, "Samoan Citizenship Bill Passes into Law," November 26, 2024, https://www.dia.govt.nz/press.nsf/d77da9b523f12931cc256ac5000d19b6/22e06bc3232e4ea1cc258be000779920!OpenDocument

functioned as a specific restriction. According to Anae Arthur Anae, "That, in my view, was a deliberate act by the New Zealand government to restrict Samoan access to New Zealand citizenship."[359]

The article further recalled that prior to its passage in 1982 the Human Rights Commission had denounced the Act:

> The Citizenship Bill involves a denial of basic human rights in that it seeks to deprive a particular group of New Zealanders of their citizenship on the basis that they are Polynesians of Samoan origin.[360]

The extent of the protest and the sentiments recorded in the article demonstrate how the 2002 movement extended beyond New Zealand to become a significant element of Samoan national identity and protest activity. The legal activism and demands for justice persisted.

Reporting on Anae's Petition in the *Savali*

The official Samoan government outlet *Savali* newspaper maintained a more neutral tone in its coverage of Anae's petition. It focused on factually reporting on diplomatic negotiations between New Zealand and Samoa. While recognizing complaints about the Citizenship (Western Samoa) Act 1982, *Savali* preferred to highlight diplomatic processes and historical relationships between Samoa and New Zealand rather than the confrontational language which appeared in the *Samoa Observer*. An article entitled "Citizenship Petition to go before NZ Parliament" indicated that the document signed by 4,000 Samoans and 100,000 New Zealanders would follow standard parliamentary procedures while highlighting "a favorable outcome is highly unlikely."[361] The article quoted Helen Clark's explanation that even though she originally opposed the Act she now believed it was "time to move on and look to the future."[362] Although its articles were generally measured in their tone, there were occasions when *Savali* articles hinted at the emotion behind the campaign. One article on April 2, 2003, documented the emotional yet controlled expression of lawyer Maiava Visekota Peteru, who played a leading role in campaigning against the act. She declared: "We respectfully and humbly present our humble petition to please repeal the Citizenship (Western Samoa) Act 1982."[363] The diplomatic tone combined with cultural respect underpinned her statement "It's not going to stop here," suggesting an enduring dedication to seeking peaceful solutions rather than open opposition.[364] *Savali* took care to reassure readers that due process would be followed stating "the Clerk of the House would decide which parliamentary select committee to send the petition to" and that the Government would "await comments from the committee before embarking on deliberations."[365]

Indeed, *Savali* articles appeared focused on managing expectations. One article characterized the petition as "historic," but also suggested it stood little chance of success. In so doing it

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[359] "6,000 March for N.Z. Citizenship," *Samoa Observer*, March 27, 2003, p. 1.

[360] "6,000 march for N.Z. Citizenship," *Samoa Observer*, March 27, 2003, p. 1.

[361] Lemalu Ros Afamasaga, "Citizenship Petition to go before NZ Parliament," *Savali,* April 2, 2003, p. 7.

[362] Lemalu Ros Afamasaga, "Citizenship Petition to go before NZ Parliament," *Savali,* April 2, 2003, p. 7.

[363] Leasina Ros Afamasaga, "The Pacific Community is important to us- New Zealand High Commissioner Dr Penelope Ridings," *Savali*, April 2, 2003, p. 6.

[364] Leasina Ros Afamasaga, "The Pacific Community is important to us," p. 6.

[365] Leasina Ros Afamasaga, "The Pacific Community is important to us," p. 6.

quoted Clark as saying that "she doesn't see any need to review the citizenship law."[366] Despite its reservations, the article again asserted due process was being followed, stating that the petition was being given "very serious consideration by the Select Committee."[367] It further mentioned that the NZ High Commissioner "welcomed the opportunity to hear as many people as possible," implying that the New Zealand government was cooperative to hearing the concerns of Samoan citizens.[368]

Despite the measured tone of its reporting, the *Savali* acknowledged criticism of the legislation. Some coverage was devoted to a significant video conference which included legal and political leaders from Samoa and New Zealand. George Barton QC, expressed his criticism of the 1982 law:

> It would be better if the 1982 Citizenship Act was called The Removal of Citizenship Act… It should make all New Zealanders ashamed. It is important to remedy a great wrong.[369]

Savali maintained balance in presenting Barton's forceful language to ensure legal precision over emotional appeal. It also reported that Anae denounced the Act as "racist" because it denied Samoans their right to live in New Zealand during his platform speech.[370] He invoked the historical dawn raids consistently, bringing a lingering sense of intergenerational despair to the proceedings. Another speaker, Maiava Visekota Peteru,[371] recalled how the "distress" of the dawn raids ensured among Samoan families in Auckland.[372]

In addition to *Savali* quoting Barton's legal critique, it also incorporated many other outside voices, ranging from legal analysis to political and community voices. *Savali's* inclusion of many different perspectives created a sense that multiple communities were engaged in this conversation. However, by filtering this discussion through established voices, *Savali's* coverage reduced the urgency of the argument. *Savali* validated the argument but shared it in a more measured way.

The paper's editorial commentary demonstrated obvious unease with using emotional or provocative language. Its commentary defended the New Zealand police methods used during the dawn raids while rebuking comparisons of these actions to genocidal regimes:

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[366] Leaupepe Rosamond L. Fa'asalele, "Citizenship Petition being heard today in NZ Parliament," *Savali,* May 7, 2003, p. 5.
[367] Leaupepe Rosamond L. Fa'asalele, "Citizenship Petition being heard today in NZ Parliament," *Savali,* May 7, 2003, p. 5.
[368] Leaupepe Rosamond L. Fa'asalele, "Citizenship Petition being heard today in NZ Parliament," *Savali,* May 7, 2003, p. 5.
[369] Lemalu Ros Afamasaga, "Views on NZ Citizenship Issue Voiced in Video Conference," *Savali,* April 2, 2003 p. 8.
[370] Lemalu Ros Afamasaga, "Views on NZ Citizenship Issue Voiced in Video Conference," *Savali,* April 2, 2003, p. 8.
[371] Lemalu Ros Afamasaga, "Views on NZ Citizenship Issue Voiced in Video Conference," *Savali,* April 2, 2003, p. 8. Maiava Visekota Peteru is a Samoan lawyer and former Member of Parliament who led efforts in Samoa to repeal the Citizenship (Western Samoa) Act 1982. April 2, 2003
[372] Lemalu Ros Afamasaga, "Views on NZ Citizenship Issue Voiced in Video Conference," *Savali,* April 2, 2003, p.8.

> How can a relatively minor inconvenience of having to have a guaranteed job… possibly be compared to the suffering caused by the persecution and mass murder…?[373]

The publication also demonstrated its support for the Samoan government by promoting respectful diplomatic engagement instead of activist confrontation. The editorial selected a quote from Maugaivao, an elderly matai, to set the perfect tone: "NZ, you were once our family… We want to return to that relationship."[374]

The *Savali* also gave favourable coverage to the perspective of New Zealand's diplomats. An article entitled "The Pacific Community is Important to Us" reported a speech by New Zealand High Commissioner Dr. Penelope Ridings on the large citizenship march that occurred in Apia. Ridings spoke to the demonstrators and confirmed that their petition would reach a select committee. She pointed out how New Zealand had expanded its investment in Pacific affairs by increasing the Ministry of Pacific Island Affairs budget by 20% since 1999.[375] The effect of the headline was to suggest the "special relationship" between New Zealand and Samoa alluded to in previous discussion of the citizenship issue was the standard pattern for relations between the two countries, thereby positioning the 1982 act as an unfortunate aberration, rather than an ongoing pattern of colonial policies towards Samoa.

Savali was careful to place the petition within the wider context of diplomacy between New Zealand and Samoa. An article on July 9, 2003 discussing the progress of the petition in New Zealand put forward the argument that positive diplomatic relations were important, citing New Zealand's formal apology to Samoa and the Treaty of Friendship.[376] As had occurred in 1982, diplomatic agreements on access to New Zealand for Samoans were advanced as evidence of a special relationship between the two. In a subsequent article in July, *Savali* cited a government synopsis of the 2003/2004 NZ Immigration Programme, and stressed that with the implementation of the new Skilled Migrant Policy, nothing changed for Samoa's quota of 1,100 migrants.[377] Thus, the *Savali* sought to comfort Samoan readers that this special relationship would remain unchanged.

In addition to focusing on positive relations between Samoa and New Zealand, the *Savali* also reported the views of New Zealand Labour Party MP Taito Philip Field. who defended the 1982 legislation.[378] It presented his argument that Samoa's inclusion in earlier New Zealand

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[373] "Editorial Comment," *Savali*, July 9, 2003, p. 5.

[374] "Editorial Comment," *Savali*, July 9, 2003, p. 5.

[375] Leasina Ros Afamasaga, "The Pacific Community is Important to Us," *Savali*, April 2, 2003. p. 5.

[376] Lemalu Ros Afamasaga, "No Decision yet on N.Z. Citizenship Petition," *Savali,* July 9, 2003, p. 5.

[377] "N.Z. Immigration Program 2003/04," *Savali Newspaper,* July 9, 2003, p. 5.

[378] Taito Phillip Field is a former Labour Party Member of Parliament of Samoa ancestry who served in Parliament between 1993 and 2007. . He was born in Manurewa and is notable for being New Zealand's first Member of Parliament of indigenous Pacific Island descent, elected in 1993. His election ushered in Pacific peoples as a recognised political force in New Zealand politics, which up until that point Pacific peoples had little political recognition, especially during the time of when the Citizenship (Western Samoa) Act 1982 came into effect. He represented South Auckland electorates Ōtara and Māngere which were both high in Pacific and Samoan populations, and served as Associate Minister of Pacific Island Affairs. Field is known for his matai title by the village of Manase in Savaiʻi as "Taito", which he received in 1975.

legislation had been “an error in drafting the legislation.”[379] In expanding upon that thought, Field went on to argue that “Samoa has never signed its sovereignty over to another power,” as other Pacific Islands had done. While he admitted that “there is no doubt there is a sense of grievance,” he cautioned against "creating false hope among those who do not understand international law regarding citizenship and independence."[380] In this way, Field avoided casting the 1982 legislation as a question of race but rather one of legal uncertainty, particularly the primacy of state sovereignty and foreign policy considerations.

In summary, whereas the New Zealand media generally adopted a neutral, albeit mildly sceptical tone towards Anae’s petition, the Samoan print media response revealed divergent positions: one emphasising long-standing historical wounds and a strong desire for restitution; the other seeking diplomatic resolution. *The Samoa Observer* focused on inter-generational generational trauma to present the 1982 Act as a severe moral failure. The government-controlled *Savali*, by contrast, adopted a restrained diplomatic tone which focused on long-term state relations and reconciliation efforts but recognized the issue's emotional and legal significance. These opposing viewpoints reflect a complex historical story which went beyond legal matters to embody issues of identity, justice, colonial legacies and the right to belong. Through his campaign Anae conveyed to both countries the necessity of historical accountability which should not be delayed by political convenience. The 2002 events showed how collective memory and ongoing public protest and advocacy efforts can advance justice even in the absence of immediate change.

Repeal of the Citizenship (Western Samoa) Act in 2024

On April 10, 2024, there was another, this time successful, initiative to repeal the Citizenship (Western Samoa) Act of 1982. Although the political context of the repeal campaign was different from 2002, in that it was initiated by Teanau Tuiono, a Green Party MP; there were some parallels in that both campaigns had been preceded by historical apologies. Prior to the 2024, campaign, then Prime Minister Jacinda Ardern had issued an apology for the Dawn Raids to Pacific Peoples on August 1, 2021. The apology referenced the racial profiling of Pacific Peoples during the Dawn Raids and the enduring scars they had caused. It also offered restitution in the form of recording an official history of the raids, developing educational material on them to be taught in schools and providing NZ$ 2.1 million in scholarships to Pacific peoples in New Zealand. Like Helen Clark’s apology to Samoa in 2002, however, Ardern’s apology did not reference the 1982 Citizenship (Western Samoa) act.[381] It was also not discussed in her memoir *A Different Kind of Power,*[382] showing how moments of redemption can

[379] He was probably referring to the British Nationality and Status of Aliens (in New Zealand) Act 1928 and British Nationality and New Zealand Citizenship Act 1948. The 1928 Act defined the legal status of British subject, and the 1948 Act replaced that status with New Zealand citizenship. Both Acts form the basis of Samoans' later claims. https://www.nzlii.org/nz/legis/hist_act/bnasoanza192819gv1928n58599.pdf

[380] Lamalu Ros Afamasaga, “Taito - on International Law; Citizenship; - and that Petition,” *Savali*, December 3, 2003, p. 3.

[381] Speech to Dawn Raids Apology delivered by Prime Minister Jacinda Ardern, 1 August 2021. https://www.beehive.govt.nz/speech/speech-dawn-raids-apology The apology was delivered as a formal government speech at a public ceremony and was also recorded and shared online, including on platforms like YouTube. See also: PM Jacinda Ardern delivers formal apology for the 1970s Dawn Raids. https://www.youtube.com/results?search_query=jacinda+ardern+apology+for+dawn+raids

[382] Jacinda Ardern, *A Different Kind of Power: A Memoir,* (Australia: Penguin Random House Australia/New Zealand, 2025).

slip from political memory. Thus, the successful repeal can be seen as the final push of a long-unresolved issue rather than a spontaneous political development in 2024.

By the time the repeal act was being considered in April 2024; the media landscape had changed significantly since the 1982 act was passed. Whereas print media, along with radio and television, were the principal forums through which New Zealand received news in 1982, by 2024 the media landscape was more diverse, with a much wider spectrum of publications. In contrast to the ambivalent nature of New Zealand print media coverage of Anae's 2002 petition, by 2024 most of the New Zealand media supported the decision to repeal the bill. *E-Tangata,* a platform centred around Māori and Pacific news and analysis, often tackling Indigenous rights and social justice matters[383] published an article on the original injustice that led to the repeal in April 2024. It explored how the Privy Council ruled in 1982 to support Falema'i Lesa who proved under New Zealand law she was entitled to citizenship from birth because New Zealand administered Samoa before its independence and explained how the New Zealand government responded. The article positively framed the 2024 bill as righting historic wrongs done by the 1982 Act, which it described as a rushed bill designed around racist anti-Pacific politics. It also discussed Anae's petition, quoting him as saying: "What had been done to our people was a complete injustice. It made me angry. I knew the issue needed to be revisited."[384] Even with legal backing from figures such as the late George Barton, however, Anae observed that successive New Zealand governments had lacked the political will to repeal the legislation. *E-Tangata* recorded how difficult Anae found it to break through the inaction of past governments: "The message fell on deaf ears."[385] *E-Tangata* also included an article by Nigel Allardyce stating that the bill amounted to "tokenism that will achieve very little for very few."[386] "While this legislation does mark a step in the right direction, it is the smallest possible step that could have been taken."[387] As will be noted later, Allardyce's comments echoed opinions among some Samoan journalists that the bill fell far short of remedying the original complaint.

The repeal campaign relied heavily on public demonstrations to raise awareness of the issue, and also on Pacific Island parliamentarians to guide the repeal through the house. Generally, coverage of this campaign was favourable. Radio New Zealand (RNZ), for instance, reported on the May 2024 Māngere rally organized by the "Mau A Samoa i le Sitiseni Niu Sila 2024" Komiti (The Samoa Mau Committee for New Zealand Citizenship 2024).[388] This event became a symbolic demonstration of Samoa's historical resistance spirit. Anae addressed the crowd, calling for enactment of the Privy Council decision: "We are only talking about the people born

[383] The New Zealand-based website E-Tangata prides itself on being a thoughtful voice reflecting Māori and Pacific perspectives in long-form commentary. They have also published stories that can analyse and critique past actions and injustices within society.

[384] Teuila Fuatai, "Righting an Injustice: Sāmoa Citizenship Bill," *E-Tangata,* April 13, 2024.

[385] Teuila Fuatai, "Righting an Injustice: Sāmoa Citizenship Bill,"

[386] Nigel Allardyce, "The Smallest Possible Step in the Right Direction," *E-Tangata,* November 23, 2024.

[387] Nigel Allardyce, "The Smallest Possible Step in the Right Direction," *E-Tangata,* November 23, 2024.

[388] The term 'Mau' meaning, "opinion" was also referred to this movement as merging voices in Sāmoa with the voices of transnational Sāmoans, was particularly important because it evoked the history of Samoa's anti-colonial movement, thereby situating this campaign within a long tradition of political activism. Mau a Sāmoa I le Sitiseni is the third Mau after The Mau a Pule and the Mau a Samoa. Komiti meaning, some main committee members were: Arthur Anae, his sister Melani Anae, Maiava Visikota Peteru, Leota Leuluaialii Ale and others.

between 1924 and 1962 when we became independent. The number is not large."[389] The RNZ article foregrounded injustice against elderly Samoans as being central to why the bill needed to pass. Rather than focusing on policy or future migration implications, speakers centered their discussion around au matutua[390] who had spent decades without citizenship rights. Youth representative Esmae Salesa summed up this sentiment: "We shouldn't allow another day to pass where our elders have been mistreated. They have been mistreated for over 50 years now."[391] By centering the injustice against elderly individuals rather than statistics or potential migrant influxes, the article presented the bill as granting dignity to a specific generation that was wronged.

The political movement achieved its essential breakthrough through Green MP Teanau Tuiono's support for the repeal bill. The Citizenship (Western Samoa) (Restoration) Amendment Act 2024, was not a government initiative. It was a Members Bill by Teanau Tuiono (a bill put forward by a Member of Parliament who is not a government minister), chosen through the MP ballot, a random selection in which members bills are drawn out of a biscuit tin.[392] On April 10th 2024, the bill underwent its first reading and achieved passage by a majority of 74-49 votes with backing from ACT and New Zealand First. New Zealand media coverage was mostly positive. According to the *New Zealand Herald* there was "fairness at the heart of the bill."[393] This was in marked contrast to its tone in 1982 when articles such as one entitled "Ending the Samoan muddle" framed the 1982 Bill as a way for New Zealand to regain "control" over a legal surprise.[394] Indeed, the *New Zealand Herald* was sympathetic to the government taking prompt action to get back to "normal immigration procedures,"[395] treating the law like a simple office fix rather than an issue of race or morality. This contrast shows a huge shift in the newspaper's stance over forty years, moving from wanting to limit rights for Samoans to finally admitting that a historical injustice took place.

Media coverage generally presented the repeal as an overdue action. Tuiono highlighted, "It is very simple. We had a group of New Zealand citizens who had their citizenship recognized and then they had their citizenship removed by statute. It's just unfair, plain and simple."[396] Public submissions commenced shortly after the bill passed and resulted in nearly 25,000 submissions by June. The submissions from both Aotearoa New Zealand and Samoa demonstrated the widespread cross-national effects. Such transnational effects were nothing new. Reflecting upon events of 1982 in his memoir *Pālemia,* Samoa's former Prime Minister

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[389] Symone Tafuna'i, "Samoan Community Rally in Support of Citizenship Bill," Radio New Zealand, May 31, 2024.

[390] The elderly or kaumatua in Maori.

[391] Symone Tafuna'i, "Samoan Community Rally in Support of Citizenship Bill," Radio New Zealand, May 31, 2024.

[392] Mitchell Alexander and Finn Hogan, "How a 30-year-old biscuit tin helps maintain New Zealand's democracy," *Stuff*, May 12, 2018, https://www.stuff.co.nz/culture/350584750/how-a-30-year-old-biscuit-tin-helps-maintain-new-zealand-s-democracy. For the text of the act see "Citizenship (Western Samoa) (Restoration) Amendment Act 2024," https://www.legislation.govt.nz/act/public/2024/48/en/latest/#LMS877475

[393] Audrey Young, "NZ First and Act Support Samoa Bill," *New Zealand Herald,* April 11, 2024.

[394] "Ending the Samoan muddle," *New Zealand Herald*, September 10, 1982, p. 6.

[395] "Panic Claims as Samoan Bill Goes Back to House," *New Zealand Herald*, September 9, 1982, p. 1.

[396] Audrey Young, "Samoa Citizenship Bill Passes First Hurdle in Parliament with Help of ACT and NZ First," *Radio New Zealand (RNZ),* April 10, 2024, https://www.rnz.co.nz/news/political/513953/samoa-citizenship-bill-passes-first-hurdle-in-parliament-with-help-of-act-and-nz-first

(1998-2021), Tuilaepa Lupesoliai Malielegaoi remembered that ambiguity stemming from the Privy Council decision made New Zealanders fear that "100,000 Samoans and their descendants" would migrate to New Zealand and obtain New Zealand citizenship. This led the Muldoon government to design the "'quota system' of 1,100."[397] Malielegaoi offered searing testimony: "It is easier to get to hell than to come to New Zealand."[398] He called the act a product of "pure racism," noting that New Zealand trained immigration officers "to hate."[399]

The primary point of contention during select committee deliberations revolved around whether the legislation would grant citizenship rights to the descendants of the impacted group. Tuiono supported expansion: "The expansion from just the original cohort to include the immediate children of those people... would have been about 15,000 to 19,000."[400] The National Party, however, voted against the Restoring Citizenship Removed by the Citizenship (Western Samoa) Act 1982 Bill at its first reading on concerns of legal precedent and unintended immigration consequences.[401] The result was a political compromise that led to a scaled-down version of the bill, excluding descendants and focusing only on those born between 1924 and 1949. By choosing to amend rather than repeal the original 1982 Act, the bill avoided potential mass depopulation in Samoa (which could have affected over 100,000 people if the scope remained open-ended) and protected existing fast-track immigration pathways. These refinements allowed National to shift from its initial opposition to full support, ultimately leading to the bill's unanimous passage in the House.

Although generally positive in their reporting on the repeal bill, New Zealand media acknowledged lingering concerns. For Anae the repeal represented a partial victory: "We all rejoice that we've got a decision that was favourable after 42 years. Personally, I'm very happy that we did that, and that they've acknowledged that there was an error."[402] But he went on: "They didn't go the whole destination... They've only given us (citizenship rights) for the old people. They've left out their descendants altogether."[403] Falema'i Lesa, whose legal action led to the Privy Council ruling, stated that the new bill did not extend sufficient rights. She supported the bill but argued "the government should reinstate the rights of the descendants of

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[397] Tuilaepa Sa'ilele Malielegaoi with Peter Swain, *Pālemia: Prime Minister Tuilaepa Sa'ilele Malielegaoi of Samoa, A Memoir* (Wellington: Te Herenga Waka University Press, 2024), 21. Tuilaepa Lupesoliai Malielegaoi was the sixth prime minister of Samoa, served from 1998 to 2021 and held positions as both a politician and economist. His was the longest prime ministerial tenure in Samoa's history and he took on the role of opposition leader between 2021 and 2022. The Human Rights Protection Party (HRPP) has been under his leadership since 1998.

[398] Grace Fiavaai, "Samoa Citizenship Bill: 'Hell' Easier to Reach than NZ," Radio New Zealand, July 2, 2024.

[399] Grace Fiavaai, "Samoa Citizenship Bill: 'Hell' Easier to Reach than NZ," Radio New Zealand, July 2, 2024.

[400] Caleb Fotheringham, "Samoa Citizenship Bill Gets Unanimous Support from Select Committee," Radio New Zealand, October 15, 2024.

[401] "All Parties Support Samoan Citizenship Bill," Radio New Zealand, October 24, 2024. https://www.rnz.co.nz/news/political/531713/all-parties-support-samoan-citizenship-bill

[402] Nigel Allardyce, "The Smallest Possible Step in the Right Direction," *E-Tangata*, Nov 24, 2024. https://e-tangata.co.nz/comment-and-analysis/the-smallest-possible-step-in-the-right-direction/

[403] Nigel Allardyce, "The Smallest Possible Step in the Right Direction," *E-Tangata*, Nov 24, 2024. https://e-tangata.co.nz/comment-and-analysis/the-smallest-possible-step-in-the-right-direction/

those Samoans who would have been New Zealand citizens under the 1982 Privy Council ruling."[404]

The limited range of the repeal bill is further shown when compared to the language used by then Prime Minister Jacinda Ardern government in the Dawn Raids apology in 2021: "Today, I stand on behalf of the New Zealand government to offer a formal and unreserved apology to Pacific communities for the discriminatory implementation of the immigration laws of the 1970s that led to the dawn raids,"[405] Although the 2024 repeal provided political redress, its passage attracted little public attention, possibly because it coincided with the Treaty Principles Bill, which dominated public debate. While apology politics admitted to deep-rooted unfairness which had occurred for many years, the citizenship repeal bill was limited and tied to a particular group of people. This tension has reinforced the perception that efforts by the New Zealand government to recognize and right historical wrongs have been acknowledged through symbolic gestures, but remain limited in providing relief for these actions.

Samoan Media Perspectives on the Repeal

The *Samoa Observer* characterized the 2024 repeal of the Citizenship (Western Samoa) Act 1982 as a long overdue act of restoring justice for thousands of Samoans whose citizenship had been unfairly stripped. It acknowledged the role of Teanau Tuiono, who hoped the bill would be more expansive in its scope but acknowledged political reality may force a compromise: "We don't get 63 votes, then the bill is dead right there."[406] Tuiono subsequently acknowledged the limitations of the reform bill: "While we had hoped for broader measures, these changes still represent meaningful progress toward justice."[407]

The process of reporting on the Restoring Citizenship Removed by Citizenship (Western Samoa) Act 1982 Bill, gave an opportunity for Samoan media to remind its readers of the injustices of the original legislation. The *Samoa Observer* reported how the Mau a Samoa i le Sitiseni 2024 group[408] maintained that the 1982 Act overturned a Privy Council decision granting New Zealand citizenship to Samoans born between 1924 and 1949. The New Zealand government swiftly enacted legislation within 8 weeks of the ruling[409] to prevent this recognition. The group emphasized public participation and their long-standing advocacy for "citizenship as of right."[410] The *Samoa Observer* also noted the contribution of former New Zealand Government

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[404] Nigel Allardyce, "The smallest possible step in the right direction," *E-Tangata*, Nov 24, 2024. https://e-tangata.co.nz/comment-and-analysis/the-smallest-possible-step-in-the-right-direction/

[405] Eleanor Ainge Roy, "Jacinda Ardern Apologises for New Zealand 'Dawn Raids' on Pasifika People in 1970s," *The Guardian,* August 1, 2021. See also Rt Hon Jacinda Ardern, "Speech to Dawn Raids Apology," New Zealand Government (Beehive), 1 August 2021, https://www.beehive.govt.nz/speech/speech-dawn-raids-apology

[406] Talaia Mika, "Support Needed to Oust Racist Kiwi Law against Samoans," *Samoa Observer,* March 27, 2024, https://www.samoaobserver.ws/category/samoa/108605.

[407] Sialai Sarafina Sanerivi, "Only One Amendment Adopted in Citizenship Bill," *Samoa Observer,* November 23, 2024, https://www.samoaobserver.ws/category/samoa/112121.

[408] Mau a Samoa i le Sitiseni is a group advocating for compensation for those affected by the 1982 Citizenship (Western Sāmoa) Act.

[409] Leone Vito-Toleafoa, "Samoans All Over Urged to Make Submissions," *Samoa Observer,* April 24, 2024, https://www.samoaobserver.ws/category/contributors/108977.

[410] Leone Vito-Toleafoa, "Samoans All Over Urged to Make Submissions," *Samoa Observer,* April 24, 2024, https://www.samoaobserver.ws/category/contributors/108977.

Minister Aupito William Sio (Minister for Pacific Peoples, 2017-2023), who was in government when Ardern apologized for the Dawn Raids in 2021. Sio remarked on the public engagement in the repeal process. Although the committee had initially hoped for 100,000 submissions, Samoa sent in more than 10,000, which Sio noted was a "huge response."[411] This suggested that the issue was more than just a concern for Aotearoa's Samoan diaspora, but also for those in Samoa who were living under the influence of the law and experienced what it could mean.

The extent of coverage demonstrates interest in the repeal process was not solely confined to New Zealand. This engagement contrasts the lack of Samoan voices in the discussions when the Act was passed in 1982. Reporting was more dynamic in 2024 with community members driving the conversation. Samoa media helped shape the narrative by reporting information, reminding readers of the Act's origins and the harm it continued to perpetuate, pushing back on narratives suggesting it was a forgotten topic.

As noted, the National Party initially opposed but eventually supported the bill during its third reading. The final version of the legislation restricted eligibility to those born between 1924 and 1949 excluding their children and grandchildren. Accordingly, the November 2024 legislation signed by Governor-General Dame Cindy Kiro reinstated citizenship rights for about 3,500 Samoans between 74 and 100 years old.[412] The repeal legislation achieved widespread celebration yet significant concerns persisted. The *Samoa Observer* editorials argued that the law's restrictive nature made it "discriminatory" and "shameful."[413] Critics pointed out practical concerns including age-related hurdles for applicants and doubts about the law's enduring usefulness to its beneficiaries.

Acting Prime Minister David Seymour of the Association of Consumers and Taxpayers (ACT) Party made an unexpected contribution to the discussion by criticizing the Muldoon government's 1982 actions as "silly" and affirming that "overturning a reasonable court finding back then was a mistake."[414] The statement from a senior coalition member confirmed the evolving political consensus that the 1982 legislation represented a significant historical injustice. Seymour's argument for repeal of the 1982 Act gains extra significance when considered alongside his advocacy for the 2024 Treaty Principles Bill.[415] Seymour criticized the Robert Muldoon government during the citizenship debate for contradicting "a reasonable court finding."[416] However, the Treaty Principles Bill was crafted so that Parliament would itself

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[411] Talaia Mika, "Aupito Confident about Submissions," *Samoa Observer,* June 4, 2024, https://www.samoaobserver.ws/category/samoa/109521.

[412] Shalveen Chand, "Samoa Citizenship Bill Passed," *Samoa Observer,* November 20, 2024, https://www.samoaobserver.ws/category/samoa/112094.

[413] Mika Kelekolio, "Should We Be Rejoicing?," *Samoa Observer,* December 1, 2024, https://www.samoaobserver.ws/category/contributors/112224.

[414] Talaia Mika, "Acting NZ Prime Minister Backs Citizenship Bill," *Samoa Observer,* June 7, 2024, https://www.samoaobserver.ws/category/samoa/109576.

[415] The Treaty Principles Bill was introduced on November 7th 2024. Its intention was to create certainty about what the Treaty principles are and how they apply in New Zealand law. It was, however, the subject of extensive criticism, many arguing the way in which it was drafted did not accurately reflect the rights Māori were granted in the treaty.

[416] Talaia Mika, "Seymour Says 1982 Citizenship Law 'Silly'," *Samoa Observer,* June 7, 2024. https://www.samoaobserver.ws/category/samoa/109576

determine what the principles of the Treaty of Waitangi mean, providing "certainty and clarity"[417] instead of deferring to how they had been interpreted by the courts.

Samoan newspapers also covered the select committee submission process. A number of submitters argued the legislation would only be meaningful if it rectified past wrongs. For some, the proposed legislation served as a measure of the government's genuine commitment to its prior apologies. The 2021 apology for the Dawn Raids would have a meaningful impact, said Peter Garrick, ex-teacher and human rights advocate, only if "attempts are made to redress past wrongs by not continuing to repeat them."[418] The new legislation served as an opportunity for New Zealand to evaluate its historical and modern policies toward the Pacific since its colonial period.

The closing stage of the legislative process showed the differences between political declarations and actual results. The government under Prime Minister Fiame Naomi Mata'afa chose to refrain from making a submission to avoid diplomatic interference, which led to criticism from *Samoa Observer* editorials claiming "this is not about diplomacy, this is about justice."[419] The newspaper's view was similar in 1982, when it also criticized Samoan leaders for not strongly protecting citizenship rights after the New Zealand government sought to bypass the Privy Council's decision. In raising this same complaint again after forty years, the *Observer* reflected its principle of putting fairness first, rather than accepting the Samoan government's perspectives on citizenship and independence. For some reporters, the repeal did not end the discussion. Further demands for citizenship by descent and financial compensation demonstrate that the opportunity for future advocacy remains active. A *Samoa Observer* editorial on 1 December 2024 asked "Was it worth it?" which now becomes a question for the affected people and their families and future Pacific leaders to answer.[420]

In Samoa, the repeal was also met with concern that it overlooked an enduring discomfort in New Zealand, the exclusion of an important historical figure, Falema'i Lesa. Though she played a critical role in ensuring the Privy Council's 1982 ruling that guaranteed Samoans the right to New Zealand citizenship under the 1928 Act, Lesa's name was notably absent from most political statements and New Zealand media coverage surrounding the 2024 repeal. Her name, indeed her story, was almost completely absent from political statements. That is because redress was framed as a legal redress, not as a moral or historical failure on the part of the New Zealand government. As a result, Falema'i Lesa received very little recognition. Her personal battle became overshadowed by a past history of wrongdoing. In comparison, Peter Garrick''s submission to the *Samoa Observer* paid tribute to Lesa as a woman who "refused to accept that she did not have the right to participate fully as a citizen of the country."[421] That

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[417] New Zealand Government (Beehive), "Next Steps Agreed for Treaty Principles Bill," 2024, https://www.beehive.govt.nz/release/next-steps-agreed-treaty-principles-bill

[418] Peter Garrick, "Submission to the Governance and Administration Committee," *Samoa Observer,* June 24, 2024, https://www.samoaobserver.ws/category/op_ed/109818

[419] The Editorial Board, "It Is about Justice, Not Diplomacy," *Samoa Observer,* July 6, 2024, https://www.samoaobserver.ws/category/editorial/109576.

[420] Mika Kelekolio, "Should we be Rejoicing?," *Samoa Observer,* December 1, 2024, https://www.samoaobserver.ws/category/contributors/112224.

[421] Peter Garrick, "Submission to the Governance and Administration Committee on 'Restoring Citizenship Removed By Citizenship (Western Samoa) Act 1982 Bill,'" *Samoa Observer*, June 24, 2024.

acknowledgment granted Lesa' agency back by framing change as a product of her lawsuit instead of merely a government act of reparation.

The 2024 legislation repeal was the effort of years of advocacy, legal battles and community initiatives that spanned multiple decades. It restored rights for certain people but left many descendants of the original affected group behind. The result showed progress made towards rectifying historical injustices while reminding us of the ongoing efforts necessary to address the full impact of the 1982 Act. Current discussions now focus on inclusion and fairness, as well as ways to evaluate justice across successive generations, instead of legal solutions.

Summary

Media coverage of the 2002 petition seeking repeal of the Citizenship (Western Samoa) Act of 1982 and the Citizenship (Western Samoa) (Restoration) Amendment Act of 2024 reflects the changing nature of media perspectives and, at a broader level, New Zealand society in that period. Anae's campaign received a mixed response in media coverage. While New Zealand media had been somewhat indifferent towards Arthur Anae's petition, Samoan media had been split with the *Samoa Observer* strongly in favour of the petition while *Savali* was much more restrained in their assessment. In 2024 by contrast, the New Zealand media were generally in favour of repealing the law. The ways in which the *New Zealand Herald* covered the 1982 and 2024 acts were total opposites. Whereas in 1982 the *New Zealand Herald* had framed the government response as a pragmatic response to a legal dilemma; its 2024 coverage emphasized the "fairness" within the repeal legislation. Samoan media were also generally in favour of the repeal but critical of its restricted application. There were some parallels with their coverage of the 1982 legislation in that they criticized the reluctance of the government to make submissions on the repeal bill. At a wider level, it may be that these changes in political action and media opinion reflect a change in attitudes between 1982 and 2024 possibly as Pacific peoples have become a larger electoral demographic and there are more Pacific MPs within New Zealand politics.

It is notable that while the 2024 repeal can be understood as a significant victory coming after decades of legal efforts and advocacy from within the community, politically speaking, this repeal was limited to restoring citizenship only for those Samoans born between 1924 and 1949, with no provision for descendants. This clashes with the language used during the 2021 Dawn Raids apology which clearly recognized that discrimination by the state caused ongoing harm for Pacific peoples across New Zealand. This gap between recognizing the issue, and offering only limited redress, represented for many an ongoing pattern in how New Zealand has responded to Pacific grievances.

CONCLUSION

This thesis set out to examine how New Zealand and Samoan media reported on the 1982 Western Samoa Citizenship Act and its subsequent repeal in 2024. To date, there has not been any substantial amount of research done on media coverage of this act, which deeply hurt many Samoans and caused significant diplomatic conflict between New Zealand and Samoa.

As a generalisation it can be argued that there were significant differences between how the New Zealand and Samoan print media reacted to the Citizenship (Western Samoa) Act of 1982. New Zealand newspapers generally affirmed the legitimacy of the government's response and the Apia Protocol. For the most part, the *Auckland Star, New Zealand Herald* and the *Press* represented the legislation as a logical, logical response to an unexpected (and it was implicitly and explicitly stated) unreasonable judgement from the Privy Council. The Privy Council decision was presented as a challenge to New Zealand sovereignty. There was little acknowledgement of the historical context of New Zealand imperialism in Samoa which created the circumstances leading to Lesa's court case.

The New Zealand print media tended to minimise the diplomatic and racial issues arising from the Privy Council decision. A *Press* editorial entitled "Out of the Samoan Mess"[422] characterised the government's response as a reasonable compromise. The *New Zealand Herald* similarly alluded to the "Samoa Muddle."[423] The Apia Protocol, which caused much protest in Samoa, was generally presented as a mutually agreed resolution to the Privy Council decision, with little discussion of the pressure apparently placed upon Vaʻai Kolone to sign the agreement.

Another common pattern in New Zealand media coverage was to present the Samoan government as unstable. The legal challenges to Vaʻai Kolone's government in Samoa received considerable coverage. Reporting of this nature served to undermine both the legitimacy of Kolone himself and by extension the political culture of Samoa. It was implied that a Samoan government beset by legal and financial difficulties would struggle to retain its people if they were all to become New Zealand citizens. By implication, it was also stated that it was appropriate for the New Zealand government to take a strong stance on the Privy Council decision because they were dealing with an unreliable state. Indeed, although New Zealand newspapers devoted some space to reporting concerns about the legislation, they also gave extensive coverage to supporting arguments. It was repeatedly suggested that the legislation would benefit the government of Samoans as it provided certainty about their citizenship status in New Zealand and would prevent an outflow of their citizens to New Zealand. It was further argued that by virtue of the quota system and the 1962 Treaty of Friendship that, irrespective of the legislation, Samoa had a special relationship with New Zealand.

The *Samoa Observer,* by contrast, depicted the Act in the context of significant moral and historical harm. It reported significant national outrage, evident in widespread protests across the country. The *Samoa Observer* asserted the legislation was not intended to correct an unexpected legal challenge but rather rejected the historical ties between New Zealand and Samoa. It was further asserted that the 1962 Treaty of Friendship had been unjustly undermined. The *Samoa Observer* criticized the New Zealand government for their negligent

[422] "Out of the Samoan Mess," *Press*, September 17, 1982, p. 12. https://paperspast.natlib.govt.nz/newspapers/CHP19820917.2.80

[423] "Ending the Samoan Muddle," *New Zealand Herald,* September 10, 1982, p. 6.

treatment of those with Samoan ancestry, linking it to the Dawn Raids and other historical examples of discrimination against Samoans.

The *Samoa Observer* argued that the New Zealand government's response was racially discriminatory. Articles, such as "From Dawn Raids to Hostility," described the legislation as a hypocritical posture and argued that the legislation was racially motivated.[424] The articles argued that the Samoan government, in order to reduce conflicts between the two countries, agreed with Muldoon's rule of deportation as Samoan government intended to reduce racial fear. In addition to criticising the actions of the New Zealand Government, the *Samoa Observer* also discussed racism in New Zealand media, such as the cartoons in the New Zealand Herald and racist language emanating from Talkback Radio. Articles in the *Samoa Observer* by both New Zealand and Samoan reporters demonstrated a nuanced understanding of New Zealand's political scene. A number suggested Muldoon was using the issue to distract the electorate from issues such as strikes and inflation which were then making his government unpopular.

The *Samoa Observer* also argued that the Act would negatively affect New Zealand's reputation abroad. Some letters pointedly noted that Samoans had served in New Zealand armed forces during the Second World War only to find they were not recognized as citizens. Other articles asserted that the actions of the government undermined New Zealand's self-image as a good international citizen and a positive actor for good in the South Pacific. The rushed nature of the select committee process and the decision to override the decision of the Privy Council, the highest court in New Zealand for reasons of political expediency was viewed as contrary to New Zealand's reputation as a country which upheld the rule of law. Actions such as promptly suspending processing citizenship applications from Samoans following the ruling were also viewed as contrary to acting in good faith. New Zealand was also presented as failing to uphold the dignity of Samoans living in New Zealand. A number of reports suggested that the Samoan government believed they needed to agree to the Apia Protocol in order to stop harassment of Samoan people in New Zealand. While the New Zealand media focused on sovereignty, the *Samoa Observer* expressed an anti-colonial approach against the New Zealand government.

One area where there was some overlap between the New Zealand print media and the *Samoa Observer* was that both criticised the government of Samoa, albeit for different reasons. Whereas the New Zealand print media presented the Samoan government as unstable, the *Samoa Observer* was critical of Kolone for, in their view, acquiescing too easily to the demands of the New Zealand government. The newspaper criticised Kolone's face-to-face discussion with Muldoon as meaningless, and asserted that the Apia Protocol represented the government of Samoa caving in to the wishes of the New Zealand Government without first consulting its citizens. Some articles in the newspaper expressed scepticism over Kolone's claim he had been given a short timeframe in which to accept the Apia Protocol, otherwise Samoan overstayers in New Zealand would be deported. In contrast to the vigorous criticism of Kolone, Tupuola Efi was generally presented more favourably. He was presented as someone who knew how to deal with Muldoon. The *Savali,* in keeping with its position as a government newspaper, took a more moderate view. It sought to present the Apia Protocol as a necessary response to provide certainty to Samoans in New Zealand.

[424] "From Dawn Raids to Hostility," *Samoa Observer,* September 22, 1982, p. 14.

The examination of news coverage on the Western Samoa Citizenship Act 1982 provides an invaluable perspective into how New Zealand viewed its relationship with Samoa, and how it continued to operate as a postcolonial power in the Pacific. Headlines describing the ruling as a "headache" for the government and narratives emphasising parliamentary intention in 1928 illustrate a state-centric perspective that overlooked the deep colonial ties between the two countries. Racial discrimination against Samoan peoples was sometimes acknowledged in New Zealand newspaper reporting but only in passing. With the exception of some of the media coverage of the select committee hearings and an article by Pito Faalogo, Samoan perspectives were seldom reported. When they were, they tended to be hidden beneath reports of legality, procedure, and political processes. Even dissent within New Zealand, as illustrated by remarks from Labour MPs like Helen Clark, was described as an internal party debate rather than a moral position on Pacific justice.

Overall, there was a clear disparity in how the New Zealand print media and the *Samoa Observer* reported on the Citizenship (Western Samoa) Act. Coverage in New Zealand centred on control, legality, and order, which replicated colonial logic, while coverage in Samoa gave voice to dispossession and moral outrage. This reveals an imbalance of power that extends beyond mere events, and continued to operate between the two countries in the late twentieth century. Examining media coverage does not merely describe what occurred, but demonstrates the structures of Pacific imperialism that persisted through the second half of the century.

Media Representations of the 2002 Petition and 2024 Repeal

Media coverage of Arthur Anae's 2002 petition and the 2024 repeal of the Citizenship (Western Samoa) Act reflected broader changes in New Zealand's relationship with the Pacific. Anae's petition coincided with New Zealand's apology for the failings of its colonial administration in Samoa. New Zealand and Samoan media treated both the petition and apology with caution. New Zealand media acknowledged the historical grievances many Samoans felt about the 1982 legislation but also argued time had moved on. As in 1982, the *Samoa Observer* and *Savali* had different positions, the Observer supported Anae's initiative whereas *Savali* advocated diplomatic engagement on the issue. Samoan media expressed mixed views on Helen Clark's apology; some welcomed New Zealand's admission of historical wrongdoing but others commented it failed to address grievances over citizenship. These dynamics changed somewhat in 2024. Comparing the media coverage of the 1982 Act and 2024 repeal, there was a marked change in tone in the New Zealand media coverage, which supported the repeal of the act and presented it as a historical injustice. However, this is not to say that New Zealand media coverage of the bill was entirely positive. Outlets such as *E-Tangata* and individual writers like Nigel Allardyce saw the Act as merely the smallest step possible. Allardyce called the bill 'tokenistic' because it didn't include descendants. The limited nature of redress the bill provided was a result of the political compromises needed to secure sufficient votes to pass the act.

The Samoan press, by contrast, was far more critical of the passing of the 2024 Act. Although *The Samoa Observer* saw the passage of the bill as "long overdue," they also believed that the bill did not go far enough in providing full restitution. They editorialised that the outcome was discriminatory and shameful, particularly in the lack of provision to restore the citizenship of the descendants. They were especially concerned with the consequences of restoring the citizenship of those who were likely to pass away in the next decade, citing the high life expectancy of older Samoans. They were especially critical of the Samoan government for not

formally responding to the bill, arguing that justice should not be sacrificed for diplomatic interests. The contrast between the 2021 apology for the Dawn Raids, which was public, passionate and internationally broadcast; and the restrained, formalised language accompanying the 2024 repeal of the Citizenship (Western Samoa) Act of 1982 was marked. One apology sought to heal, the other showed how far we still have to go.

Although the coverage in both Samoa and New Zealand celebrated the passage of the bill as an important moment, there was a marked difference in the tone between New Zealand and Samoa. While the New Zealand media highlighted the issue as a moment to put the issue to rest, the Samoa media highlighted that the repeal bill does not complete the story. This contrast points to the difference between how these outlets tended to see the issue of colonial injustice. New Zealand media generally saw it as an opportunity to close an unpleasant chapter in the country's history, whereas Samoan media saw an unfinished story of colonial accountability and multi-generational justice.

The *Samoa Observer* also questioned why descendants of Samoans affected by the 1982 act were not included in the provision for the repeal. Whereas New Zealand newspapers tended to marginalise Falema'i Lesa, the *Samoa Observer* acknowledged her ongoing significance. Lesa's legacy is intergenerational. As she put herself forward, the injustice she exposed did not end with her but with thousands of Samoan families for decades after. By restricting the application of the repeal to only the living, the new law foreclosed any legal redress for the thousands of those descendants who are still alive and many of whom are now elderly. For many Samoans, the lack of recognition of Lesa's legacy, along with the repeal's limited terms of restitution, revealed a state unwilling to engage with the historical and racial dimensions of the problem. Symbolic apologies are once again prioritized over restitution.

Wider Significance of this Research

By exploring the complex legal, political, and media narratives around the repeal of the Western Samoa Citizenship Act 1982, this research helps to illustrate how New Zealand's treatment of Samoa was bound up in the construction of citizenship, belonging, and notions of justice. The 1982 law was more than a piece of legal draft. It was an expression of how New Zealand thought about its former 'Trust Territory' and how far it would go to curb Pacific immigration, even at the cost of denying a shared history.

This research has shown how different constructions of the same issue were evident in the two nations. In New Zealand, newspapers emphasised legal matters, the original parliamentary purpose of previous legislation relating to Samoan citizenship, and New Zealand's ongoing relationship with Samoa. In Samoa, however, the media highlighted how this debate addressed issues of dignity, racial equity, and the quest for postcolonial independence.

This research therefore helps explain a broader pattern of New Zealand's enduring influence in the Pacific beyond formal colonial rule.[425] Even though formal ties with Samoa have ended, the

[425] Angus Ross, *New Zealand Aspirations in the Pacific in the Nineteenth Century,* (Oxford, Clarendon Press, 1964), p. 4; Mary Boyd, "New Zealand and the Other Pacific Islands," in Keith Sinclair, ed., *The Oxford Illustrated History of New Zealand*, (Auckland: Oxford University Press, 1996), pp. 295-322; Tony Ballantyne, *Webs of Empire: Locating New Zealand's Colonial Past* (Wellington: Bridget Williams Books, 2012), 45-47; Tony Ballantyne, "The State, Politics and Power, 1769-1893," in Giselle Byrnes, ed., *The New Oxford History of New Zealand* (Melbourne: Oxford University Press, 2009), pp. 99-124. Damon Salesa, "New Zealand and the Pacific," in *An Indigenous Ocean: Pacific Essays* (Wellington: Bridget

ability to define rights, restrict movement, and dictate narratives continues to be concentrated in New Zealand institutions. As the absence of Falema'i Lesa in the 2024 political debate shows, real reconciliation involves more than a new bill, it requires centring the people who made justice possible in the first place. Even after 43 years of independence, the 1982 Western Samoa Citizenship act and restoration bill illustrate that the decolonisation process is not a thing of the past but an ongoing process.

Finally, this research contributes widely to the ongoing call of Pacific scholarship that demands New Zealand recognise its colonial past in the process maintaining its relationships with the region. It unveils that Pacific justice is not just a legal debate, rather a question of respect, voice and memory.

Personal reflection

Despite eventually attaining citizenship in the "land of milk and honey" through the Samoan Quota system, the route to New Zealand for many immigrants from Samoa was tangled with immigration policies designed to restrict access.[426] My family were among the many affected by these policies and this research has given me a more detailed understanding of the circumstances which shaped their experiences.

Through this research, I have been able to identify through the medium of media coverage, the processes and struggles of those who paved the way to reverse the Act. Figures like Arthur Anae and Falema'i Lesa deserve to be celebrated for their bravery and resilience to reclaim what took decades to restore.

Concluding thoughts

In this thesis, the Citizenship (Western Samoa) Act 1982 and its repeal have been analysed with reference to Samoan and New Zealand media. These two contrasting accounts have shown there is much to be uncovered in how these two nations have interacted with each other. The 1982 Act and the 2024 restoration bill show that decolonisation was not confined to the past but remains an ongoing political and legal process. Further research could study how Samoans have been represented in media coverage from the colonial era to the present. This would show rhythms of racism, exclusion, and changing ideas about what it means to be from the Pacific in a country after colonialism. Such a study could also explore the editorial perspectives, ownership and political allegiances that have informed the ways Samoan voices have been included or excluded. It might reveal why certain stereotypes about Pacific peoples have endured even as formal changes have taken place. A comparative media analysis of New Zealand and Pacific media sources could also investigate if the pattern of symbolic inclusion without structural change has occurred in other Pacific issues. Future work should ask whose voices are heard, whose histories are valued and whose justice is still deferred.

As demonstrated, media narratives are not mere reporting rather they construct legitimacy, identity and justice. As historian Damon Salesa puts it, "New Zealand is a nation that exists on Pacific Islands, but does not, will not, perhaps cannot, see itself as a Pacific Island nation."[427]

Williams Books, 2023), pp.113-160. Damon Salesa, "New Zealand's Pacific," in Giselle Byrnes, ed. *New Oxford History of New Zealand,* (Melbourne: Oxford University Press, 2009), pp. 149-172.

[426] **"**Milk And Honey Land No More," *New Zealand Herald,* Aug 23, 1982, p. 1.

[427] Damon Salesa, *Island Time: New Zealand's Pacific Futures,* (foreword), (Wellington: Bridget Williams Books, 2017).

He reminds us further that New Zealand holds "a legacy of colonialism and decolonisation overseas that it has never properly come to terms with." As for Samoa, "decolonisation… was as much about New Zealand severing ties with Samoa as Samoa severing ties with New Zealand."[428] It is to be hoped that the process of decolonisation will be expedited by historically and culturally informed media coverage of the relationship between New Zealand and the Pacific.

[428] Damon Salesa, *Island Time: New Zealand's Pacific Futures* (Wellington: Bridget Williams Books, 2017), p. 21.

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